

FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

April 28, 2026

California Housing Finance Agency
500 Capitol Mall, Suite 1400
Sacramento, CA 95814

This Notice shall satisfy the above-cited two separate but related procedural notification requirements for activities to be undertaken by California Housing Finance Agency.

REQUEST FOR RELEASE OF FUNDS

On or about May 14, 2026, California Housing Finance Agency will submit a request to the U.S. Department of Housing and Urban Development (HUD) for the reservation of \$42,210,050 in funds from the Housing Finance Agency Risk-sharing: Section 542(c) program, as authorized by the Housing and Community Development Act of 1992 (12 U.S.C. 1707) and Section 235 of HUD's FY 2001 Appropriation Act, Public Law 106-377, as amended, a program of the U.S. Department of Housing and Urban Development (HUD) to undertake a project known as **Sky Castle** for the purpose of providing affordable housing. The Program provides new insurance authority independent of the National Housing Act. Section 542(c) provides credit enhancement for mortgages of multifamily housing projects whose loans are underwritten, processed, serviced, and disposed of by California Housing Finance Agency (CalHFA). HUD and CalHFA share in the risk of the mortgage.

The 333 Flower project, also known as Sky Castle, (project, undertaking) will be the first phase of an adaptive reuse project located at the World Trade Center building in Downtown Los Angeles (333 South Figueroa Street, Los Angeles, CA 90071). The development will convert the building's two concourse levels – positioned above four levels of above-ground parking – into 241 affordable housing units. The project will serve households earning between 30% and 80% of the Area Median Income (AMI) and will include 179 one-bedroom units, 57 two-bedroom units and 5 three-bedroom units. The area of work will be limited to the existing building, specifically, the two concourse levels and the basement level. The interiors of the two concourse levels will be adaptively reused from commercial offices to residential units. In the basement, select areas of concrete slab and soil will be removed, and new or enlarged concrete foundations will be added. All other areas of the existing building, including the existing office tower levels, are not part of the project. The project may require demolition, reconstruction and trenching work required to provide utilities to the site and to upgrade any required facilities that may be in the public right-of-way, including curb, gutter and sidewalk as needed. The project will be affordable to

households earning between 30 and 80 percent of Los Angeles County Area Median Income (AMI). Two of the two-bedroom units will operate as non-rental employee units.

The total project cost is estimated to be \$104,407,116.

FINDING OF NO SIGNIFICANT IMPACT

California Housing Finance Agency has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act (NEPA) of 1969 is not required. Additional project information is contained in the Environmental Review Record (ERR). The ERR will be made available to the public for review electronically. Please submit your request by email to Elizabeth Brown, eabrown@calhfa.ca.gov. The ERR can be accessed online at the following website:

<https://www.calhfa.ca.gov/about/press/public-notice/index.htm>

PUBLIC COMMENTS

Any individual, group or agency disagreeing with this determination or wishing to comment on the project may submit written comments to Elizabeth Brown, Loan Administrator, California Housing Finance Agency, via email to eabrown@calhfa.ca.gov. All comments received on or before May 13, 2026, will be considered by California Housing Finance Agency prior to submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

The California Housing Finance Agency certifies to HUD that Anthony Sertich, Executive Director, in his capacity as NEPA Certifying Officer, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities, and allows the California Housing Finance Agency to use Program funds.

OBJECTIONS

HUD will accept objections to the Responsible Entity's (RE) Request for Release of Funds and Environmental Certification for a period of fifteen days following the submission date specified above or the actual receipt of the request (whichever is later) only if they are on the following bases: (a) the certification was not executed by the Certifying Officer or other officer of the California Housing Finance Agency approved by HUD; (b) the RE has omitted a step or failed to make a determination or finding required by HUD regulations at 24 CFR Part 58 or by CEQ regulations at 40 CFR 1500-1508, as applicable; (c) the RE has omitted one or more steps in the preparation, completion or publication of the Environmental Assessment or Environmental Impact Study per 24 CFR Subparts E, F or G of Part 58, as applicable; (d) the grant recipient or other participants in the development process has committed funds for or undertaken activities not authorized by 24 CFR Part 58 before release of funds and approval of the environmental certification; (e) another Federal, State or local agency has submitted a written finding

that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58) and shall be emailed to the HUD grant administration office at: MFW-Public-Notices@HUD.gov or mailed to U.S. HUD San Francisco Regional Office, Region IX, Office of Housing-Federal Housing Commission, One Sansome Street, Suite 1200, San Francisco, CA 94104. Potential objectors should contact HUD to verify the actual last day of the objection period.

Anthony Sertich, Executive Director and NEPA Certifying Officer

April 2026



**U.S. Department of Housing and Urban
Development**

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

Environmental Assessment

Determinations and Compliance Findings for HUD-assisted Projects

24 CFR Part 58

Project Identification:	Sky Castle
Responsible Entity:	California Housing Finance Agency
Preparer:	Bay Desert, Inc.
Month/Year:	April 2026

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Development**

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Washington, DC 20410
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Environmental Assessment

Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: Sky Castle

Responsible Entity: California Housing Finance Agency
500 Capitol Mall, Suite 1400
Sacramento, CA 95814

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Preparer: Cinnamon Crake, President, Bay Desert, Inc.

Certifying Officer Name and Title: Anthony Sertich, Executive Director

Consultant (if applicable): Bay Desert, Inc.
422 Larkfield Center #104
Santa Rosa, CA 95403
(707) 523-3710
ccrake@baydesert.com

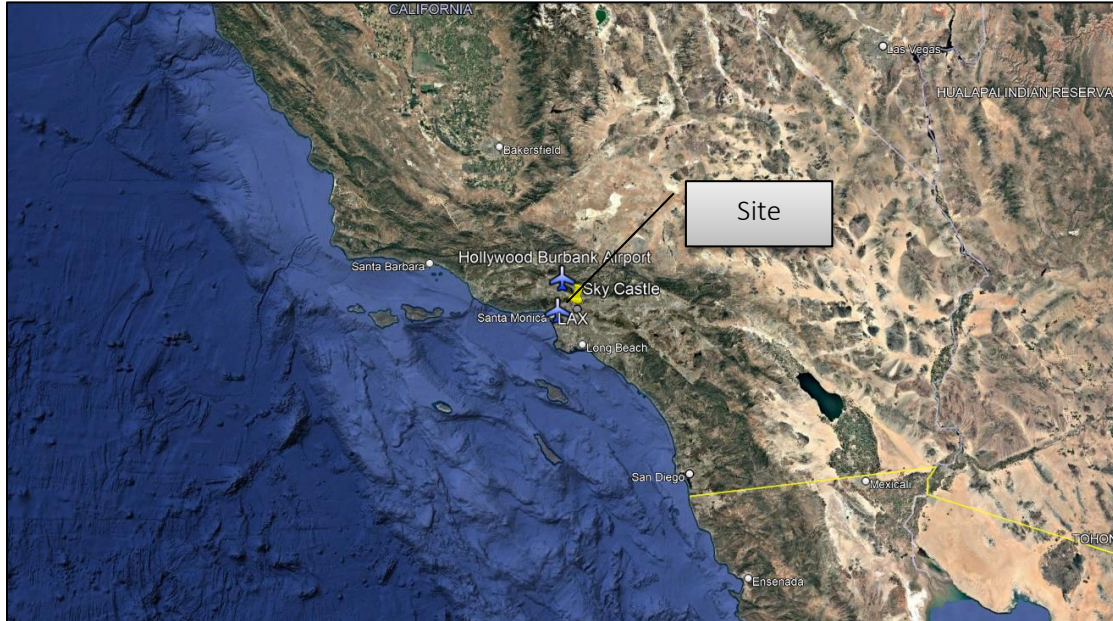
Direct Comments to: Elizabeth Brown, Loan Administrator
eabrown@CalHFA.ca.gov
(916) 326-8818

Project Location: 350 South Figueroa (333 South Flower Street), Los Angeles, Los Angeles County, California 90071 (APN 5151-011-020)

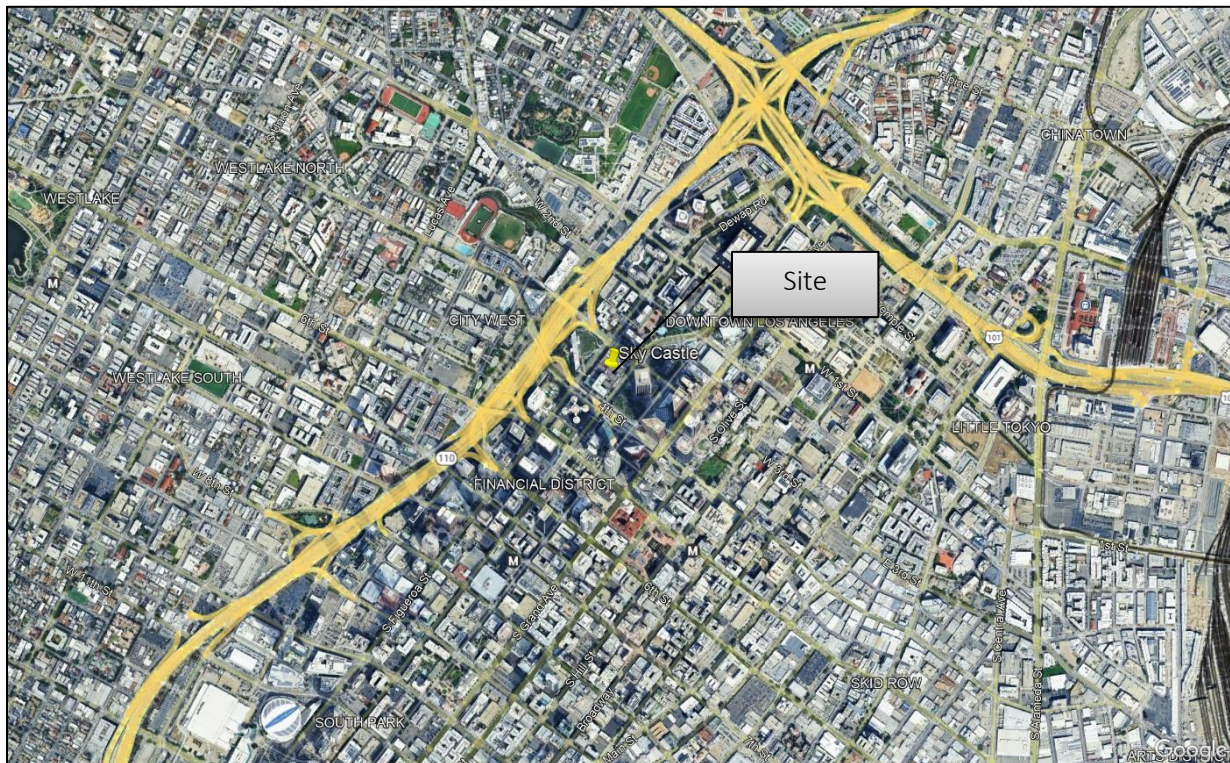
Project Location

Sky Castle

350 South Figueroa (333 South Flower Street), Los Angeles, Los Angeles County, California 90071 (APN 5151-011-020)



Map 1 Regional Setting

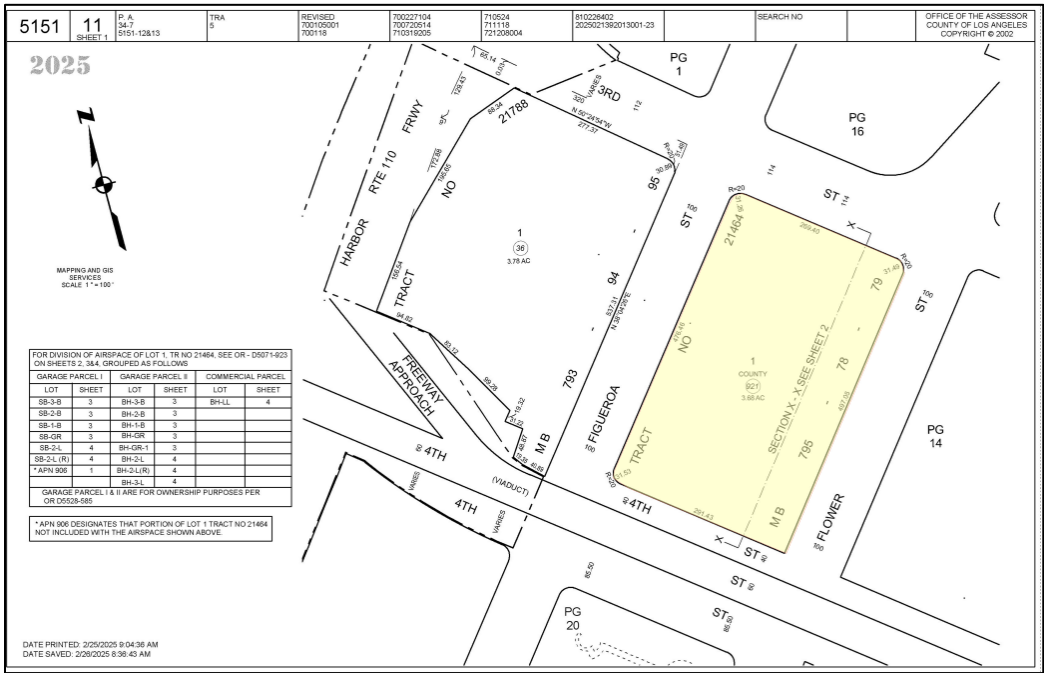


Map 2 Local Setting

Project Location

Sky Castle

350 South Figueroa (333 South Flower Street), Los Angeles, Los Angeles County, California 90071 (APN 5151-011-020)



Map 3 Assessor Parcel

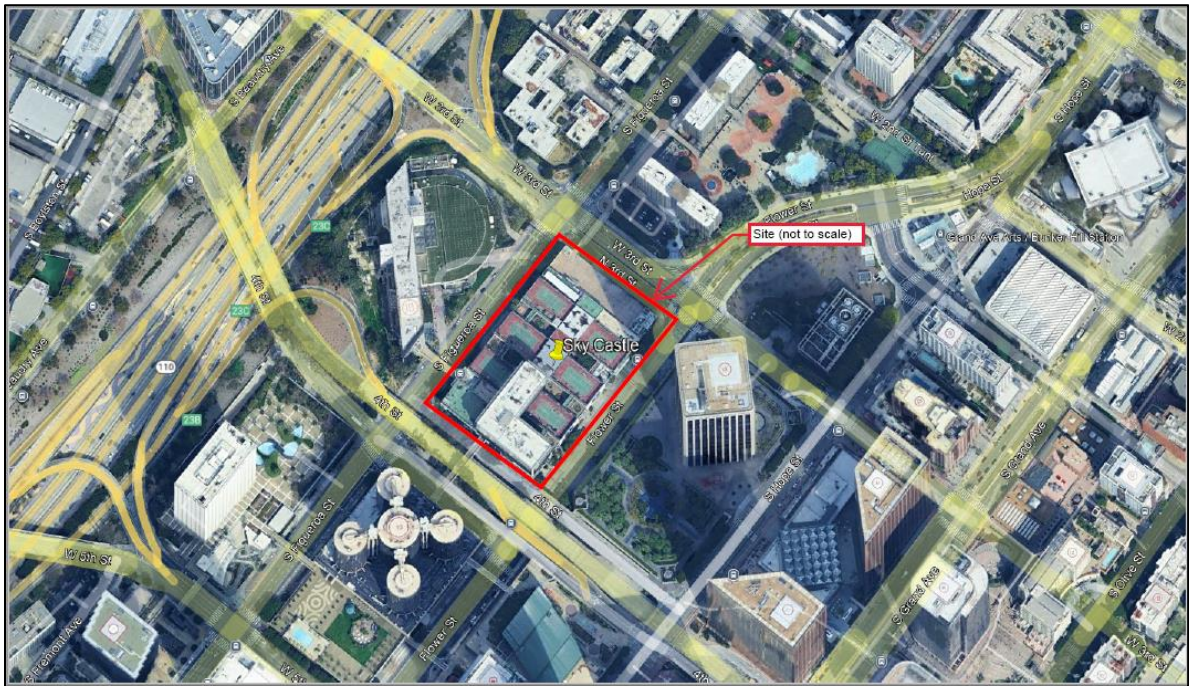


Photo 1 Existing Conditions/Arial View

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Sky Castle, 350 South Figueroa (333 South Flower Street), Los Angeles, Los Angeles County, California 90071 (APN 5151-011-020):

The 333 Flower project, also known as Sky Castle, (project, undertaking) will be the first phase of an adaptive reuse project located at the World Trade Center building in Downtown Los Angeles (333 South Figueroa Street, Los Angeles, CA 90071). The development will convert the building's two concourse levels – positioned above four levels of above-ground parking – into 241 affordable housing units. The project will serve households earning between 30% and 80% of the Area Median Income (AMI) and will include 179 one-bedroom units, 57 two-bedroom units and 5 three-bedroom units.

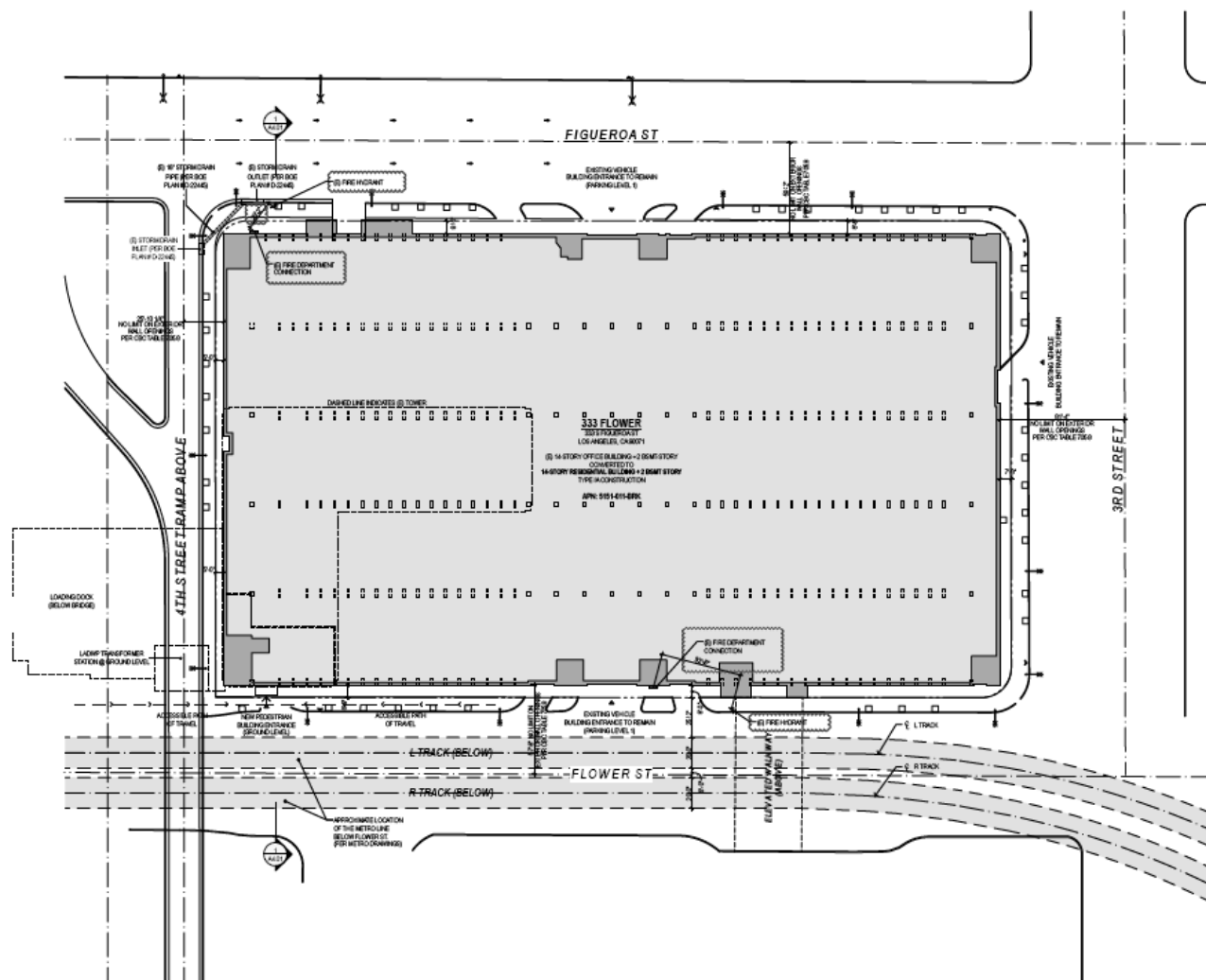
The area of work will be limited to the existing building, specifically, the two concourse levels and the basement level. The interiors of the two concourse levels will be adaptively reused from commercial offices to residential units. In the basement, select areas of concrete slab and soil will be removed, and new or enlarged concrete foundations will be added. All other areas of the existing building, including the existing office tower levels, are not part of the project.

The project may require demolition, reconstruction and trenching work required to provide utilities to the site and to upgrade any required facilities that may be in the public right-of-way, including curb, gutter and sidewalk as needed.

The project will be affordable to households earning between 30 and 80 percent of Los Angeles County Area Median Income (AMI). Two of the two-bedroom units will operate as non-rental employee units.

Source: (1) (Appendix A)

Rockefeller Partners



Sky Castle I
333 Flower | Los Angeles, CA
5/10/25

DRAFT

1/32" = 1'-0"
SITE PLAN

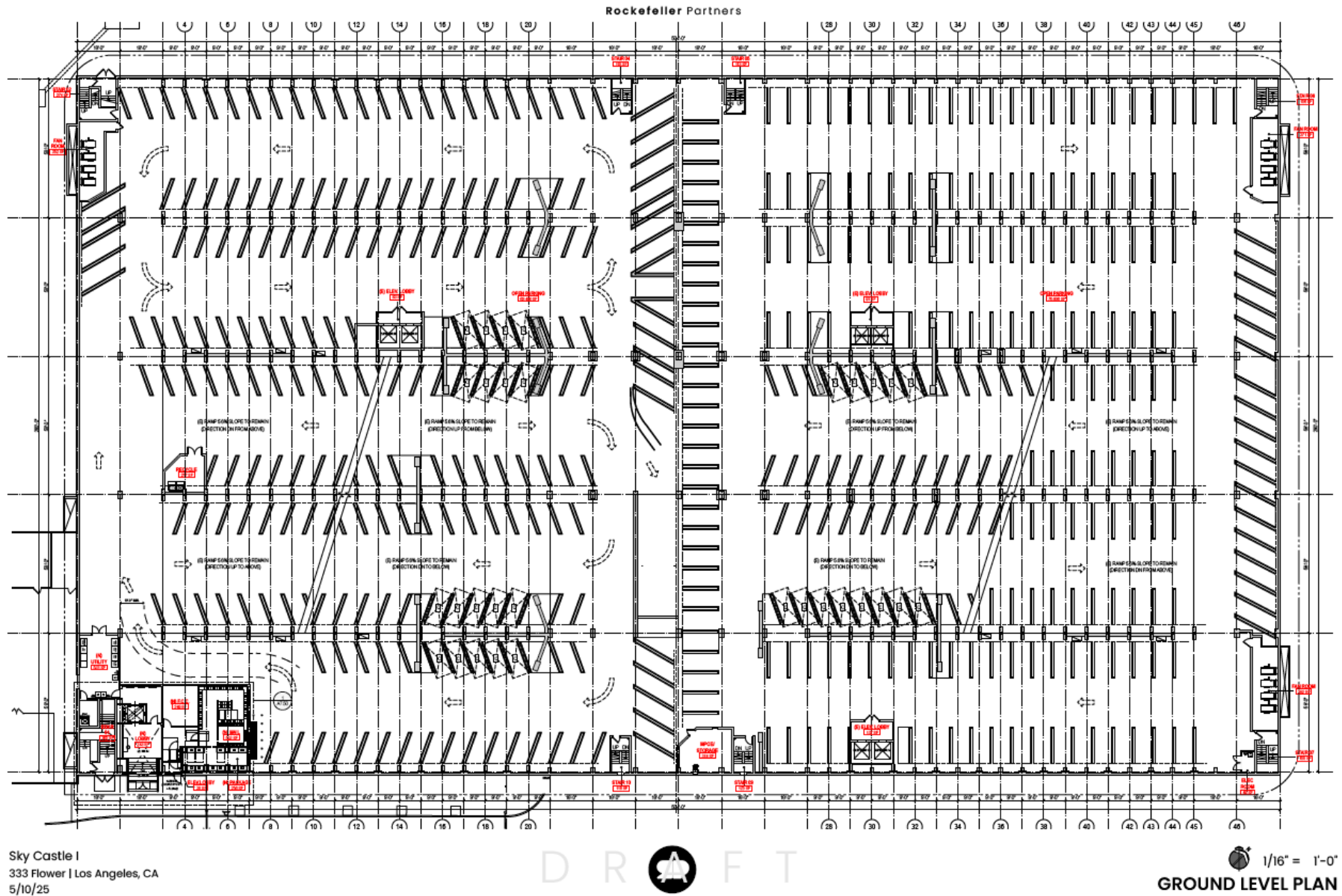


Figure 2 Ground Level Plan

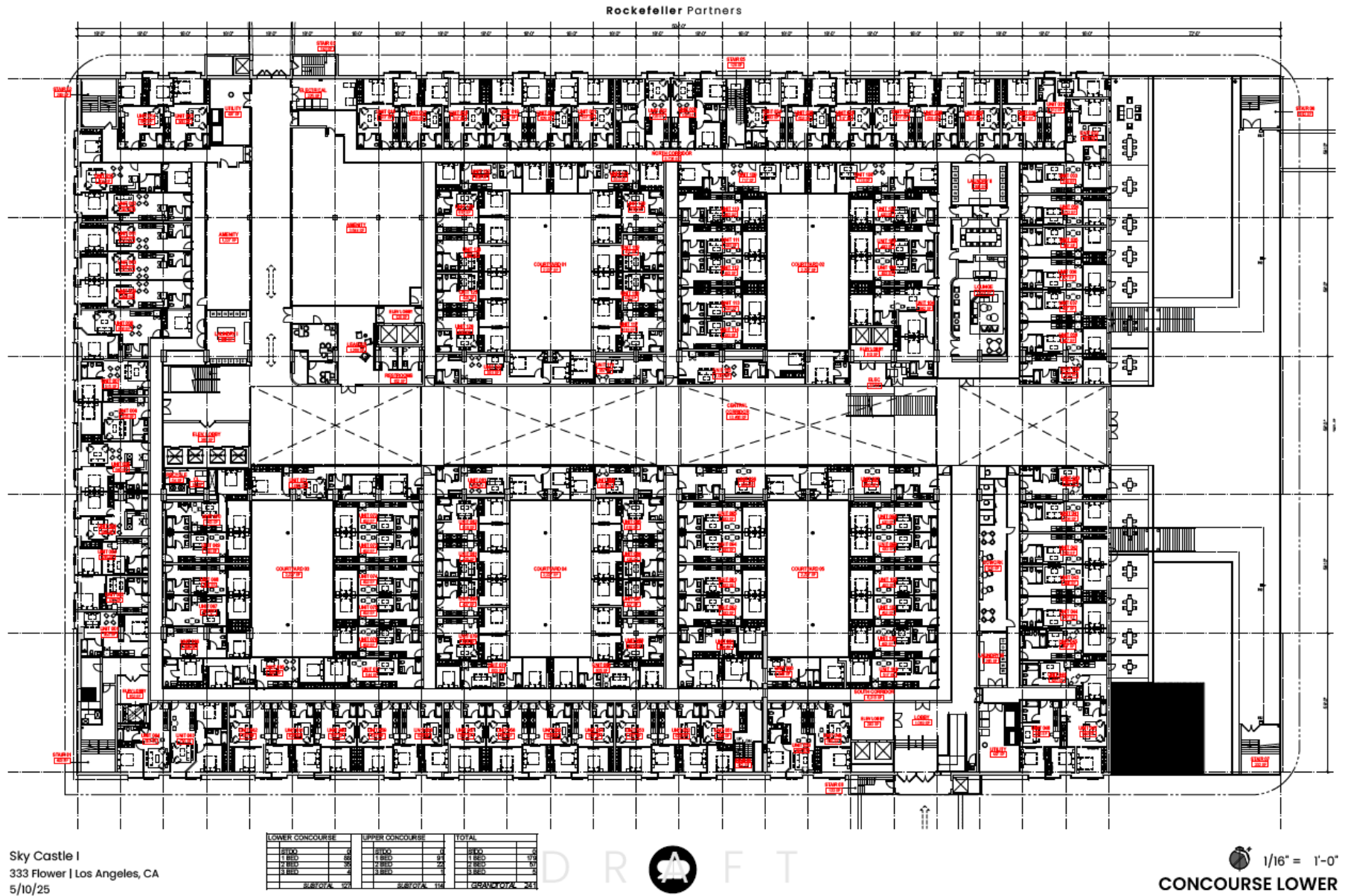


Figure 3 Lower Concourse Level

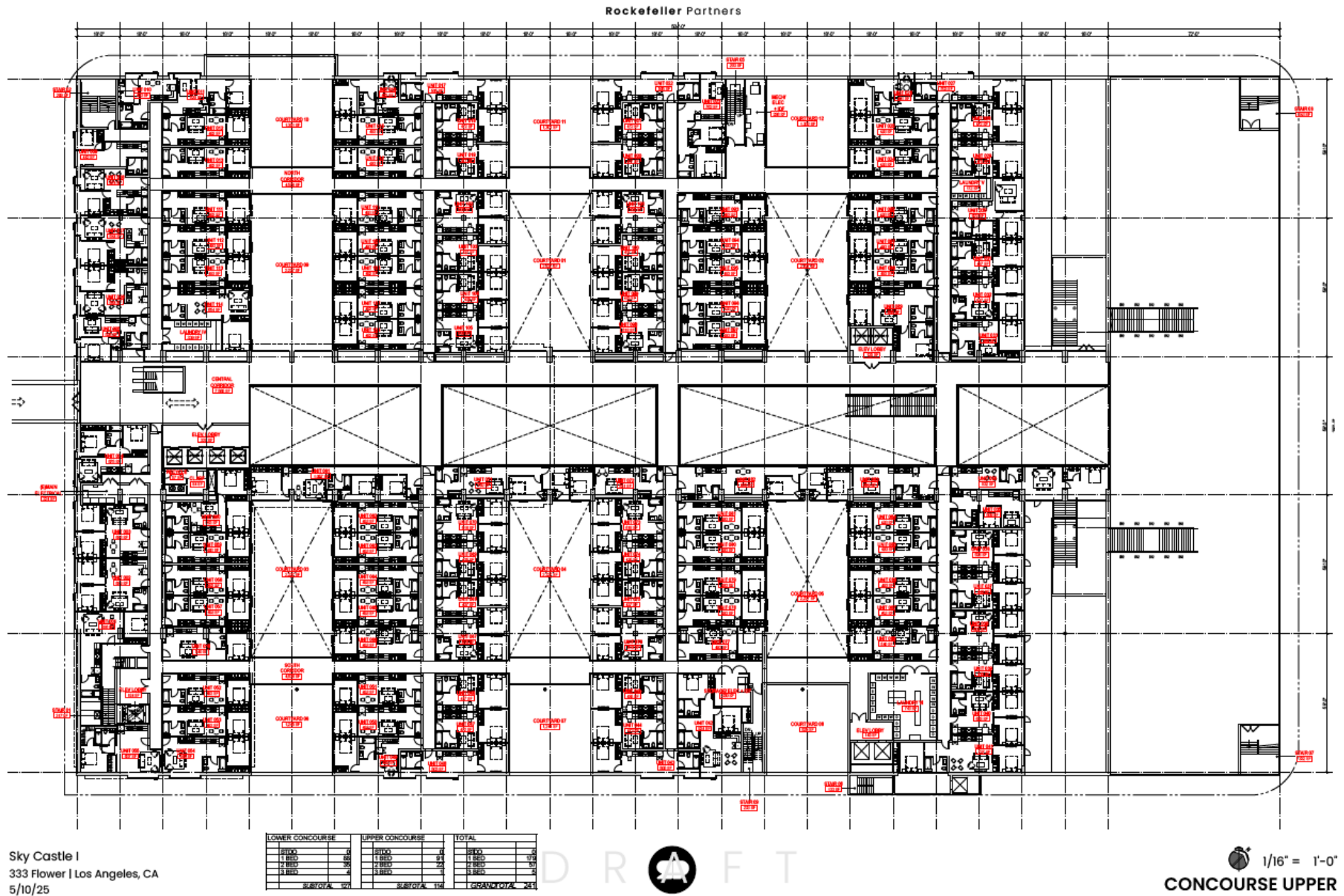


Figure 4 Upper Concourse Level

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of the project is to provide affordable housing to households earning between 30% and 80% of the AMI. The proposal will rehabilitate two concourse levels containing commercial office space in an existing building into 241 residential housing units with amenities. .

Excerpts follow that come from the City of Los Angeles *Housing Element of the General Plan 2021-2029*.

Los Angeles is one of the most dynamic cities in the world. However, with its continued growth and economic success has come increasing challenges relating to the need for more affordable housing and support to help homeless Angelenos off the street and into homes. Simply put, over the past 40 years, Los Angeles has welcomed more people without adding enough places for them to live. While the City has made significant progress in the last eight years, much more needs to be done to achieve the kind of City Angelenos have made clear they desire. Housing is key to this vision.

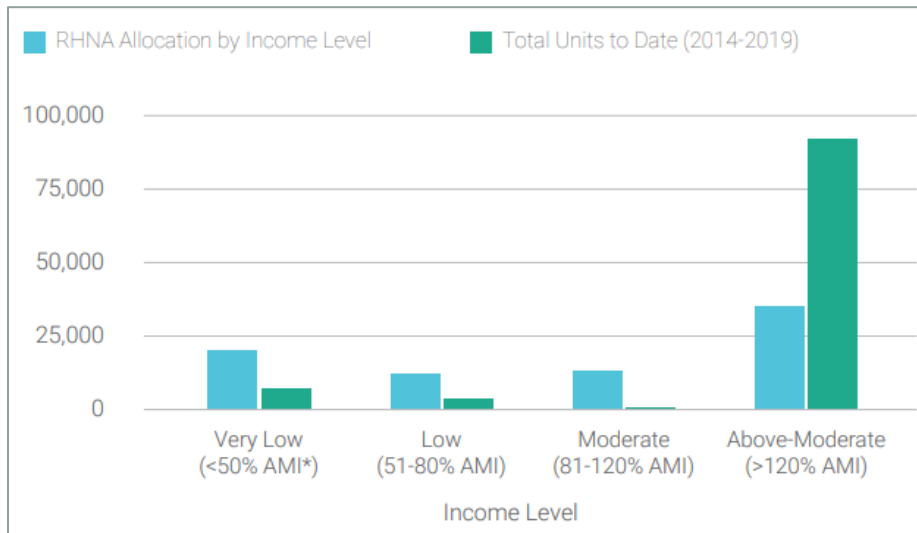
It is a cliché to say that the City of Los Angeles is in a housing crisis. However, the negative impacts resulting from the severe misalignment of housing costs and incomes in this City are hard to overstate. Angelenos pay more of their income on housing, live in more overcrowded conditions, and have the highest rates of unsheltered homelessness of any city in the country. Almost half of all households struggle to pay their rent and mortgage, with more than a third of renters spending half their paycheck on rent . Many workers in the City are forced to live far from their jobs, which worsens commute times, our air quality and greenhouse gas emissions.

While rising housing costs impact all segments of the housing market, it is particularly dire for those with low incomes, the unhoused, and those with special housing needs. These populations frequently face discrimination, health conditions, lack of transportation, and unemployment that exacerbate difficulties in accessing permanent housing. Despite significant advances in housing individuals that may have lost their home, and providing for special needs, homelessness continues to increase as people are losing their housing faster than new housing can be provided and obtained.

Displacement pressures are intensifying and Angelenos (particularly families with children) are increasingly leaving the City because, in part, they no longer find it possible to afford the cost of housing. Young people in particular, are not able to form households. With housing options so limited, many households are only able to find affordable housing in traditionally lower income neighborhoods, which intensifies gentrification pressures. Unequal access to neighborhoods with high resources and opportunities such as good jobs, transit, parks, and amenities exacerbates segregation, economic disparities, unhealthy living conditions, and commute times.

Most experts point to a lack of adequate, affordable housing for the population as the root of the local housing crisis. Los Angeles has the second fewest number of homes per adult of major US cities. If the City of Los Angeles had the same number of homes per adult as the national average, the City would have an additional 129,000 homes. This shortage has developed primarily since the 1980s, as the population in Los Angeles grew much faster than the creation of new housing. Down-zonings during this period limited the land area and intensities at which housing could be built.

To address worsening statewide housing needs California's Housing Element Law has undergone numerous revisions in recent years. These changes include new requirements to account for existing unmet housing needs when planning for housing. As such, the City's new Regional Housing Needs Assessment (RHNA) allocation is significantly higher this cycle, reflecting the severe shortage of available and affordable housing in Los Angeles.

Table 1 Regional Housing Needs Allocation (RHNA) by Income Level and Total Units to Date 2014-2020

For this current 2021-2029 Housing Element 6th cycle, the regional Southern California Association of Governments (SCAG) issued a target of 456,643 housing units for the entire City of Los Angeles, of which 184,721 units (40%) are designated for very low- and low-income households. These figures are more than five times higher than the prior cycle. This significant increase is primarily the result of changes in state law that included new markers of existing housing needs such as overcrowding and cost burden in the RHNA.

Table 2 RHNA Targets by Income Level (cycle comparison)

Income Level	2013-2021 Target Units	2021-2029 Target Units
Very Low-Income (0-50% AMI)	20,426	115,978*
Low-Income (51-80% AMI)	12,435	68,743
Moderate-Income (81-120% AMI)	13,728	75,091
Above Moderate-Income (Over 120% AMI)	35,412	196,831
Total Units:	82,002	456,643

*Note: 57,989 (50%) of the Very Low-Income units are considered to be Extremely Low-Income (ELI)

Source: (2)

The project will contribute to the regional housing needs identified above.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The proposed Project site is approximately 0.10 miles east of Interstate 110 and approximately 0.55 miles south of U.S. Route 101. The proposed area of potential effect (APE) comprises an entire city block and is located at the junctions of South Figueroa Street and North 3rd Street and Flower Street and 4th Street. The APE is surrounded by commercial and multi-family residential land uses, including hotels, luxury apartments, commercial high-rise buildings, and business parks.

The project site located on an entire city block in downtown Los Angeles. The property is improved with a 10-story office building, which is situated above a six-story parking garage that includes three levels above grade and three subterranean levels. The tower occupies one corner of the property. The site is divided into 'air right' parcels. The proposal is rehabilitation of two levels of commercial office space into residential housing. The conversion will require basement improvements and ground disturbance.

Source: (3) (4) (5)

Trends

The current state of the multifamily market for Los Angeles County reflects the trend of increasing housing costs. According to California Association of Realtors (CAR)'s resale report for May 2023, the median sold price of existing single-family homes in Los Angeles County was \$744,770, showing a slight increase of 0.8% compared to the previous month. Meanwhile, rental rates for multifamily properties in Los Angeles have surged 11.2% higher than their pre-pandemic peak. Average market rents have reached \$2,179 per month, which is approximately 35% above national averages.

According to Los Angeles Almanac, from 1850 to 2020, the population of Los Angeles County expanded to be 2,837 times larger. In comparison, over the same span, California's statewide population increased by a factor of 427. These population surges have amplified the strain on housing availability and affordability, illustrating an escalating demand for housing solutions. According to data from the California Association of Realtors, the Months' Supply of Inventory of single family homes (SFH) for Los Angeles County is now 2.2 months. The SFH represents the number of months it would take to sell all the homes on the market based on the current sales pace if no new listings were added. The current supply falls below the level recommended by economists for a well-balanced market, which is around six months. Cal Matters, a nonprofit newsroom in California, highlights how the "California Housing Partnership estimates it needs to be building closer to 120,000 affordable units a year." The low inventory level exacerbates the already high demand, creating a highly competitive housing market. Further, the imbalance between supply and demand puts upward pressure on prices.

Income inequality and a high cost of living are other factors contributing to affordability challenges in the Los Angeles multifamily market. Two percent of California's population resides in the 30 wealthiest zip codes, but astonishingly, these areas hold 20% of the state's entire net worth. The gap between high and low incomes is significant, with a large portion of the population earning wages that are insufficient to meet the high cost of living.

Source: (6)

Housing is not equally accessible for all residents throughout the City of Los Angeles. Elderly, disabled individuals (including those with developmental disabilities), female-headed households, large families (5 or more persons), farmworkers, and homeless households often face significant barriers in obtaining affordable and accessible

housing suitable to their specific needs. Residents in these special needs categories are also sometimes subjected to explicit housing discrimination and face unique housing challenges, also due to other zoning and regulatory barriers impacting access to housing and opportunity. Information about the number of special needs populations in the City of Los Angeles can be found in the table below.

Table 3 Special Needs Populations, City of Los Angeles.

	Persons	Households
Seniors (65+)	491,598	281,001
Seniors with Disabilities	179,493	N/A
Non-Seniors with Disabilities (16-64)	217,738	N/A
Large Families (5 or More Persons)	N/A	172,811
Single Female-Headed Households w/ Related Children	N/A	111,054
Persons Living with HIV/AIDS	N/A	N/A
Homeless Persons	41,290**	N/A
Farm Workers	6,621	N/A

Source: ACS 5-Year Estimate, 2019; * 2009 Estimate by AIDS Coordinator Office, City of Los Angeles; ** 2020 LAHSA Greater Los Angeles Homeless Count

Source: (2)

The project will help alleviate the housing issues described above by providing affordable housing for low-income households.

Funding Information

Grant Number	HUD Program	Funding Amount
122-98059	YHN 542(c) HFA Risk Sharing – New Construction – CFDA No. 14.188	\$42,210,050

Estimated Total HUD Funded Amount: \$42,210,050 in HFA Risk Sharing funds

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: **\$104,407,116**

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No ☐ ☒	Airports within 15 miles of the subject property include Los Angeles International Airport (LAX), a major airport located 11.5 miles to the south-southwest. There are no military airfields within 15 miles. There are five (5) minor airports within 15 miles. All are located over 10 miles from the site (see Appendix B). The site does not lie within any airport accident potential zone or airport clear zone. Source Documentation: (3) (7) (8) (9) (Appendix B)
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No ☐ ☒	There are no Coastal Barrier Resources in California. Source Documentation: (10)
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-	Yes No ☐ ☒	The site is not located in a Special Flood Hazard Area that would require flood insurance. The project site is entirely located within Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) area designation Zone X: Areas of Minimal Flooding. The project site is not located within a 100-year floodplain or 500-year floodplain. The project is not a Critical Action.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
4128 and 42 USC 5154a]		The County of Los Angeles is a participant in the National Flood Insurance Program (NFIP) and property owners should be encouraged to purchase flood insurance; however, flood insurance is not required. Source Documentation: (11) (Appendix C)
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No ☒ ☐	An analysis was provided by the project sponsor that is cited below. The narrative did not provide an author; however, Douglas Kim and Associates LLC provided the source documentation; therefore it is assumed they prepared the text below as well. Citations from their Part 50 document are cited here and elsewhere in this document where indicated. Clean Air The Clean Air Act was implemented to remedy the damaging effects that bad air quality can have on human health and the environment and was most recently revised in 1990, when major changes were enacted. The Clean Air Act is administered by the EPA, which sets National Ambient Air Quality Standards (NAAQS). NAAQS are limits on certain “criteria” air pollutants, including limits on how much of the pollutants can be in the air anywhere in the U.S. Geographic areas that are in compliance with the NAAQS are called “attainment areas,” while areas that do not meet the standards are called “nonattainment” areas. Areas that were previously designated as nonattainment areas but have now met the standard (with EPA approval of a suitable air quality plan) are called “maintenance” areas. The proposed Project falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) within the South Coast Air Basin. According to NEPAassist, which uses the USEPA’s Office of Air and Radiation data, the Los Angeles County portion of the South Coast Air Basin (Basin) is a nonattainment area for the 8-hour O₃ standard, PM_{2.5} (24-hour and annual), and lead (Pb). To meet HUD air quality guidelines, the proposed Project must follow the State Implementation Plan, which describes how an area will meet the NAAQS. State Implementation Plan guidelines require the proposed Project ensure its criteria pollutant emissions are below SCAQMD’s significance thresholds (SCAQMD 2023).

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		The Project Site's location in Downtown Los Angeles close to major public rail and bus transportation is consistent with regional efforts to improve transit availability and would reduce the level of emissions (PM_{2.5}) associated with motor vehicle travel. By developing affordable housing consistent with the growth anticipated by the General Plan and existing zoning and land use designations, the proposed Project is in compliance with the State Implementation Plan and 2022 Air Quality Management Plan. Air quality at the Project Site could be negatively impacted by fugitive dust (PM₁₀) and other particulate air pollutants (PM_{2.5}) released during construction-related activities, such as land clearing and grading. Exhaust emissions (oxides of nitrogen [NOx] and CO) released by heavy construction vehicles could also temporarily impact air quality. Impacts from fugitive dust emissions during construction would be regulated by SCAQMD Rule 403. The California Emissions Estimator Model (CalEEMod), version 2022.1.1.29 was used to estimate criteria air pollutant emissions during the construction and operational phases for the proposed Project. Pollutant estimates for PM_{2.5}, PM₁₀, SOx, NOx, volatile organic compounds, and CO found that all would be below SCAQMD thresholds during the construction and operational phases. Specifically, project construction would result in up to 2.2 lb/day PM_{2.5}, 4.4 lb/day PM₁₀, 0.1 lb/day SOx, 19.0 lb/day NOx, 7.1 lb/day volatile organic compounds, and 35.5 lb/day CO. These would not exceed the SCAQMD's thresholds for regional emissions of 55 lb/day PM_{2.5}, 150 lb/day PM₁₀, 150 lb/day SOx, 100 lb/day NOx, 75 lb/day volatile organic compounds, and 550 lb/day CO. Project operations would result in up to 1.0 lb/day PM_{2.5}, 3.6 lb/day PM₁₀, less than 0.1 lb/day SOx, 2.1 lb/day NOx, 8.6 lb/day volatile organic compounds, and 39.2 lb/day CO. When existing emissions from the office uses on the Project Site are considered, the project would result in a net decrease of all pollutants except VOC as follows: -0.8 lb/day PM_{2.5}, -2.8 lb/day PM₁₀, <0.1 lb/day SOx, -1.5 lb/day NOx, 0.1 lb/day volatile organic compounds, and -8.7 lb/day CO. These would not exceed the SCAQMD's thresholds for regional emissions of 55 lb/day PM_{2.5}, 150 lb/day PM₁₀, 150 lb/day SOx, 100 lb/day NOx, 55 lb/day volatile

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		organic compounds, and 550 lb/day CO and would generally result in a beneficial impact on air quality. Construction of the proposed Project would produce approximately 956 MTCO₂e/yr (metric tons of greenhouse gases (GHGs)). The SCAQMD recommends amortizing construction emissions over 30 years, which would equate to 55 metric tons per year for the proposed Project. In total (i.e., operations plus amortized construction), the proposed Project is expected to produce 1,138 MTCO₂e/yr. When the 2,116 MTCO₂e/yr from the existing office uses are considered, the Project would result in a net decrease of 1,105 MTCO₂e/yr. The Proposed Project is exempt from a federal general conformity analysis under the Clean Air Act, as it qualifies as a presumed-to-conform action and is otherwise exempt under 40 CFR §93.153. Specifically, the Project falls under a categorical exclusion criteria pollutant emissions are below the thresholds established by SCAQMD for the nonattainment area. Additionally, since the City of Los Angeles is located within a designated Metropolitan Statistical Area with an approved State Implementation Plan (SIP), and the project is consistent with the region's transportation and air quality plans, further conformity review is not required. HUD's environmental regulations at 24 CFR Part 58 also provide procedures for environmental review that satisfy conformity requirements when projects are consistent with local plans and involve minimal air quality impacts. Toxic Air Contaminants (TACs) The project site is located in Downtown Los Angeles south west of the interchange of the 110 Freeway and Highway 101 (Hollywood Freeway). The site is within 1,000 feet of a freeway (about 570 feet southeast of the 110 Freeway). There are many Stationary Sources of emissions permitted by the Air District near the site. The downtown location and high-rise nature explain the many backup generators present in the downtown Los

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		Angeles area. The site is not near industrial operations that would generate significant TACs that would require further analysis. The South Coast Air Quality Management District does not include CEQA Thresholds of Significance for TACs, but the City of Los Angeles restricts building residential housing within 500 feet of a freeway. The subject property is beyond the 500' foot setback requirement. A review the Air Quality Index on a typical day should cumulative levels at the site in Yellow, defined as "Moderate". The South Coast Air Quality Management District MATES V Data Visualization Tool shows that Central L.A. has an excess cancer risk of 752 per million total; and a Chronic Hazard Index of 4.7 micrograms per cubic meter. <u>Adopted Ordinance Addressing Impacts of Air Quality</u> As part of the Clean Up Green Up initiative, on April 26, 2016, City of Los Angeles City Council amended Articles 5 and 9 of Chapter IX of the Los Angeles Municipal Code (L.A.M.C.) to address sources of outside air in buildings and requiring all new mechanically ventilated buildings located within 1,000 feet of the freeway to install air filtration media that provides a Minimum Efficiency Reporting Value (MERV) of 13 (Ordinance 184245). <u>Conclusion</u> The project will install MERV13 filtration, which removes 85% of diesel particulate matter or DPM. The project meets air quality standards and is free of toxic gases with Mitigation Measures. AQ1. Due to proximity to the freeway, MERV13 filtration is required for each unit. AQ2. An Operations and Maintenance Plan (O&M) that details regular inspection and filter changes is required. Source Documentation: (12) (13) (14) (15) (16) (17) (18) (Appendix D)

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations																																						
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No ☐ ☒	Los Angeles County has a Local Coastal Program. The project site is over 12 miles from the Pacific Ocean and outside of mapped areas of Coastal Zone that require a permit. In addition, the project is adaptive re-use of two floors of an existing building and does not involve development of vacant property. A Coastal Development Permit is not required. Source Documentation: (7) (19) (20) (Appendix H)																																						
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No ☒ ☐	In March 2025, a Phase I Environmental Site Assessment was prepared by AEI Consultants for the project site. Excerpts follow. Phase I Environmental Site Assessment AEI Consultants (AEI) was retained to conduct a Phase I ESA in conformance with the scope and limitations of ASTM Standard Practice E1527-21 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), for the property located at 350 South Figueroa Street, Los Angeles, Los Angeles County, California (the "subject property"). The purpose of the Phase I is to document compliance with 24 CFR §58.5(i)(2) or §50.3(i). Table 4 Subject Property Details <table border="1"> <thead> <tr> <th colspan="2">Property Information</th> </tr> </thead> <tbody> <tr> <td>Site Address(es)</td> <td>350 South Figueroa Street, Los Angeles, Los Angeles County, California 90071</td> </tr> <tr> <td>Property ID (APN or Block/Lot)</td> <td>5151-011-020 through 5151-011-034 (even)</td> </tr> <tr> <td>Location</td> <td>Bound by South Figueroa Street to the west, North 3rd Street to the north, South Flower Street to the south and West 4th Street to the west</td> </tr> <tr> <th colspan="2">Site and Building Information</th> </tr> <tr> <td>Approximate Site Acreage/Source</td> <td>3.68/Assessor</td> </tr> <tr> <td>Number of Buildings</td> <td>One</td> </tr> <tr> <td>Building Construction Date(s)/Source</td> <td>1974/Assessor</td> </tr> <tr> <td>Building Square Footage (SF)/Source</td> <td>394,128/Assessor</td> </tr> <tr> <td>Number of Floors/Stories</td> <td>10</td> </tr> <tr> <td>Basement or Subgrade Area(s)</td> <td>Yes; subterranean garage</td> </tr> <tr> <td>Number of Units</td> <td>110</td> </tr> <tr> <td>Additional Improvements</td> <td>The subject property is developed with a 10-story office building, which is situated above a six-story parking garage that includes three levels above grade and three subterranean levels.</td> </tr> <tr> <td>Property Type</td> <td>Office</td> </tr> <tr> <td>On-site Occupant(s)</td> <td>Various office tenants</td> </tr> <tr> <td>Current On-site Operations/Use</td> <td>Office and administrative activities</td> </tr> <tr> <td>Current Use of Hazardous Substances</td> <td>Yes; refer to Section 7.1</td> </tr> <tr> <th colspan="2">Regulatory Information</th> </tr> <tr> <td>Regulatory Database Listing(s)</td> <td>HWTS (x12), HAZNET (x6), RCRA NONGEN/NLR (x2), FINDS, ECHO (x2), EMI, EDR HIST AUTO, UST (x2), EDR HIST CLEANER</td> </tr> </tbody> </table>	Property Information		Site Address(es)	350 South Figueroa Street, Los Angeles, Los Angeles County, California 90071	Property ID (APN or Block/Lot)	5151-011-020 through 5151-011-034 (even)	Location	Bound by South Figueroa Street to the west, North 3rd Street to the north, South Flower Street to the south and West 4th Street to the west	Site and Building Information		Approximate Site Acreage/Source	3.68/Assessor	Number of Buildings	One	Building Construction Date(s)/Source	1974/Assessor	Building Square Footage (SF)/Source	394,128/Assessor	Number of Floors/Stories	10	Basement or Subgrade Area(s)	Yes; subterranean garage	Number of Units	110	Additional Improvements	The subject property is developed with a 10-story office building, which is situated above a six-story parking garage that includes three levels above grade and three subterranean levels.	Property Type	Office	On-site Occupant(s)	Various office tenants	Current On-site Operations/Use	Office and administrative activities	Current Use of Hazardous Substances	Yes; refer to Section 7.1	Regulatory Information		Regulatory Database Listing(s)	HWTS (x12), HAZNET (x6), RCRA NONGEN/NLR (x2), FINDS, ECHO (x2), EMI, EDR HIST AUTO, UST (x2), EDR HIST CLEANER
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Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		According to historical sources, a gasoline service station was historically located in the southeastern portion of the subject property from approximately 1937 until 1965. No information pertinent to the status and operation of an UST system and/or the removal of USTs was located through review of historical sources. In addition, no documentation was available indicating whether soil and/or other subsurface media samples were collected and analyzed for the presence of petroleum hydrocarbon impacted in the subsurface media. Additionally, according to historical sources, several dry cleaners and a car paint shop historically operated in the northwestern, western, and southeastern portions of the subject property at various times between 1906 and 1958. These historical operations may have utilized various solvents. However, the subject property was redeveloped with the current building between 1972 and 1974, which includes a subterranean parking garage, extending three floors below ground surface and redevelopment activities are expected to have removed large amounts of soil including all or large portions of the potential source areas. Furthermore, the estimated depth to groundwater at the subject property is over 50 feet bgs. Based on the extensive excavation and soil removal activities associated with the construction of the current building and estimated depth of groundwater, the historical gasoline service station, dry cleaners, and car paint shop are not considered evidence of a REC. According to the City of Los Angeles Department of Building & Safety and Department of Planning, the subject property is located near significant oil production areas known as “Methane (Buffer) Zones.” Methane (Buffer) Zone sites include properties immediately surrounding gas sources and where testing and mitigation are required by the City of Los Angeles Department of Building and Safety. Due to the potential environmental risk associated with construction in Methane (Buffer) Zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property (Division 71 of the Los Angeles Building Code). AEI recommends that a methane assessment be conducted for the subject property prior to any future redevelopment activities.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		AEI accessed the Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System (HWTS) online database for information pertaining to hazardous waste disposal associated with the subject property. The HWTS generates reports on hazardous waste shipments for generators, transporters, and treatment, storage or disposal facilities (TSDFs). From at least 1992 until 2015, hazardous waste has been generated at the property. The subject property has been occupied by office and commercial tenants since 1975 and the reports above are not considered evidence of a REC. <u>Vapor Migration</u> A vapor encroachment condition (VEC) is the presence or likely presence of Chemical(s) of Concern (COC) vapors in the vadose zone of the subject property caused by the release of vapors from contaminated soil and/or groundwater either on or near the subject property. AEI conducted a limited screening for potential VECs that may affect the subject property. The VEC screening focused on the current and historical usage of the subject property and also utilized the aforementioned regulatory agency database report provided by EDR to evaluate identified Chemicals of Concern (COCs), including petroleum hydrocarbons. To identify the area of concern (AOC) for contaminated sites with non-petroleum hydrocarbon COCs, AEI utilized the approximate minimum search distance defined by the current ASTM E2600 of 1,760 feet (1/3 mile) from the subject property boundary for COC-contaminated sites. For sites contaminated with petroleum hydrocarbon COCs, AEI utilized the AOC approximate minimum search distance of 528 feet (1/10 mile). The AOC was adjusted accordingly based on review of physical setting characteristics, known release information, property and land features, groundwater flow direction, and soil type, et al. ASTM's Vapor Encroachment guidance indicates that when groundwater flow direction can be estimated or determined, the cross-gradient or downgradient radius distances can be significantly reduced. AEI calculated the reduced AOC distances when considering

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations												
		groundwater flow direction by utilizing the following default distances, which were determined using the Buonicore Methodology: Non-petroleum hydrocarbon COCs: • 1,760 feet in the upgradient direction • 365 feet in the cross-gradient direction • 100 feet in the downgradient direction Petroleum hydrocarbon COCs if Light, Non-Aqueous Phase Liquid, (LNAPL, i.e. floating product) is suspected: • 528 feet in the upgradient direction • 165 feet in the cross-gradient direction • 100 feet in the downgradient direction Petroleum hydrocarbon COCs if LNAPL is not suspected: • 528 feet in the upgradient direction • 95 feet in the cross-gradient direction • 30 feet in the downgradient position No VEC was identified in the report. Table 5 Vapor Encroachment Condition <table><tr><th>Source</th><th>VEC Identified</th><th>VEC Not Identified</th><th>Comments</th></tr><tr><td>Subject Property</td><td></td><td>✓</td><td>N/A</td></tr><tr><td>Adjoining and/or Nearby Site(s)</td><td></td><td>✓</td><td>N/A</td></tr></table> <u>Findings</u> <u>Significant Data Gap(s)</u> is defined by the current ASTM Standard E1527 as a data gap that affects the ability of the environmental professional to identify a recognized environmental condition. • AEI did not identify significant data gaps which affected the ability to identify RECs. <u>Recognized Environmental Condition (REC)</u> is defined by the current ASTM Standard E1527 as (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or	Source	VEC Identified	VEC Not Identified	Comments	Subject Property		✓	N/A	Adjoining and/or Nearby Site(s)		✓	N/A
Source	VEC Identified	VEC Not Identified	Comments											
Subject Property		✓	N/A											
Adjoining and/or Nearby Site(s)		✓	N/A											

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. • AEI did not identify evidence of RECs during the course of the assessment. <u>Controlled Recognized Environmental Condition (CREC)</u> is defined by the current ASTM Standard E1527 as a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations). • AEI did not identify evidence of CRECs during the course of the assessment. <u>Historical Recognized Environmental Condition (HREC)</u> is defined by the current ASTM Standard E1527 as a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). • AEI did not identify evidence of HRECs during the course of the assessment. <u>Other Environmental Considerations</u> include, but are not limited to, de minimis conditions and/ or business environmental risks such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in the ASTM Standard. These may also affect the liabilities and financial obligations

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		of the client, the health and safety of site occupants, and the value and marketability of the subject property. - According to the City of Los Angeles Department of Building & Safety and Department of Planning, the subject property is located near significant oil production areas known as “Methane (Buffer) Zones.” Methane (Buffer) Zone sites include properties immediately surrounding gas sources and where testing and mitigation are required by the City of Los Angeles Department of Building and Safety. Due to the potential environmental risk associated with construction in Methane (Buffer) Zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property (Division 71 of the Los Angeles Building Code). AEI recommends that a methane assessment be conducted for the subject property prior to any future redevelopment activities. - According to the client, renovations to portions of the interior of the building are planned for the near future. Regardless of building construction date, the EPA’s NESHAP requires that an asbestos survey adhering to AHERA sampling protocol be performed prior to demolition or renovation activities that may disturb ACMs. This requirement may be enforced by the local agency enforcing the federal EPA regulations. The NESHAP regulation specifies that all suspect ACMs be sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants. Based on the potential presence of ACMs throughout the remainder of the building, AEI recommends the implementation of an O&M Plan which stipulates that the repair and maintenance of damaged materials should be performed to protect the health and safety of the building occupants. In the event that building renovation or demolition activities are planned, a thorough asbestos survey to identify asbestos-containing building materials is required in accordance with the EPA

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		NESHAP 40 CFR Part 61 prior to demolition or renovation activities that may disturb suspect ACMs. Due to the age of the subject property building, there is a potential that LBP is present. During the site reconnaissance, water damaged painted walls were observed in stairwells. Further, AEI understands that renovation of the subject property building is planned. AEI recommends that the property owner consult with a certified Lead Risk Assessor to determine options for control of possible LBP hazards. Stringent local and State regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62. <u>Conclusions</u> AEI performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E1527-21, of 350 South Figueroa Street, Los Angeles, Los Angeles County, California, the subject property. The assessment revealed no evidence of recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the subject property. <u>Recommendations</u> AEI recommends no further investigation for the subject property at this time. Methane Assessment Methane Specialists conducted a <i>Methane Investigation</i> in October 2025. The investigation determined that Methane gas was detected at the probes at the site at concentrations below the parts per million in volume (ppmv) levels that require a methane mitigation system. Therefore, according to Table 1B, <i>Mitigation Requirements for Methan Buffer Zones</i>, this project falls under Design Level II, with less than 2

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		inches of water-column gas-pressure. The project does not require a methane mitigation system. No mitigation measures for methane are required. <i>Mitigation Measures:</i> CT1. Regardless of building construction date, the Environmental Protection Agency's (EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP) requires that an asbestos survey adhering to Asbestos Hazard Emergency Response Act (AHERA) sampling protocol be performed prior to demolition or renovation activities that may disturb Asbestos Containing Materials (ACM). The NESHAP regulation specifies that all suspect ACMs be sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants. Based on the potential presence of ACMs throughout the remainder of the building, an Operations & Maintenance (O&M) Plan which stipulates that the repair and maintenance of damaged materials should be performed to protect the health and safety of the building occupants. A thorough asbestos survey is required to identify asbestos-containing building materials in accordance with the EPA NESHAP 40 CFR Part 61 prior to demolition or renovation activities that may disturb suspect ACMs. CT2. Due to the age of the building (51 years), there is a potential that Lead-Based Paint (LBP) is present. The property owner shall consult with a certified Lead Risk Assessor to determine options for control of possible LBP hazards, including water damaged painted walls in stairwells. Stringent Federal, State and local regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the Occupational Safety and Health (OSHA) lead standard contained in 29 CFR 1910.1025 and 1926.62.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		CT3. Complete abatement of hazardous materials is preferred. All HUD lead safe standards apply. Of any hazardous materials remain, an Operations & Maintenance Plan (O&M) is required. Source Documentation: (4) (21) (Appendix E)
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No ☐ ☒	Context The project site is located in an urban area, occupies a city block in Downtown Los Angeles, and is covered in impervious surfaces. The project involves rehabilitation of the upper and lower concourse levels, and a portion of the basement. Federally-Listed Endangered and Threatened Species The United States Fish and Wildlife Service (USFWS) was contacted on September 2, 2025, for a list of Special-Status plants and animals that have a potential to occur on the subject property. The following list was provided. <u>Birds</u> - Coastal California Gnatcatcher (<i>Polioptila californica californica</i>) - Southwestern Willow Flycatcher (<i>Empidonax traillii extimus</i>) <u>Reptiles</u> (proposed) Southwestern Pond Turtle (<i>Actinemys pallida</i>) <u>Amphibians</u> (proposed) Western Spadefoot (<i>Spea hammondi</i>) <u>Insects</u> (proposed) Monarch Butterfly (<i>Danaus plexippus</i>) <u>Flowering Plants</u> - Nevin's Barberry (<i>Berberis nevinii</i>) <u>Critical Habitats</u> - None

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		Site Conditions The site is covered in impervious surfaces (buildings and paved areas). There are no waterways or wetlands on or near the property. There is no exposed soil that could provide suitable habitat for special-status plants or animals. The site is a developed parcel in a highly urbanized area (Downtown Los Angeles). The site contains no habitat for Special-Status plants and animals. There are no natural or sensitive habitats such as riparian, wetland or aquatic habitat on or near the site. The project is rehabilitation; there is no effect. Conclusion The project does not have the potential to affect listed species due to the lack of any suitable habitat on the site. The urban in-fill exemption appears appropriate. There is <i>No Effect</i> under the Endangered Species Act. Source Documentation: (1) (3) (22) (23) (Appendix C)
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No ☐ ☒	Existing Above-ground Storage Tanks (ASTs) An EDR Radius Map Report with a custom search distance was pulled in September 2025. The EDR report listed all above-ground storage tanks (ASTs) within a mile. AST: A listing of aboveground storage tank petroleum storage tank locations. A review of the AST list, as provided by EDR, has revealed that there are 76 AST sites within 1 mile of the target property (please see attached report for a complete list). • There are seven ASTs within 1/8 mile. • There are 10 ASTs between 1/8 and ¼ miles. • There are 35 ASTs between ¼ and ½ miles. • There are 24 ASTs between ½ mile and one mile from the subject property.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations																								
		The high number of ASTs is not unexpected as each building in the Downtown Los Angeles area where the project is located likely has a backup generator or several. The seven nearest 7 tanks (within 1/8 of a mile) are discussed below. Table 6 Above-ground Storage Tanks (ASTs) <table><tr><th>AST Location</th><th>Gallons</th><th>Calculated Acceptable Separation Distance (ASD)</th><th>Outside of ASD?</th></tr><tr><td>Union Bank Plaza 445 S Figueroa Street Los Angeles, CA¹ 0.072 miles SW 380 feet SW</td><td>Not Reported</td><td>n/a</td><td>n/a</td></tr><tr><td>Central Plants, Inc. 715 W 3rd Street 0.084 miles East 444 feet East</td><td>Not Reported</td><td>n/a</td><td>n/a</td></tr><tr><td>Central Plants, Inc. 715 W 3rd Street 0.084 miles East 444 feet East</td><td>3,175</td><td>ASD for Thermal Radiation for People (ASDPPU) is 447 feet ASD for Thermal Radiation for Buildings (ASDBPU) is 85 feet</td><td>No</td></tr><tr><td>US Bank NA 221 S Figueroa Street 0.088 miles NNE 465 feet NNE</td><td>Not Reported</td><td>n/a</td><td>n/a</td></tr><tr><td>Union Bank Plaza</td><td>Not Reported</td><td>n/a</td><td>n/a</td></tr></table>	AST Location	Gallons	Calculated Acceptable Separation Distance (ASD)	Outside of ASD?	Union Bank Plaza 445 S Figueroa Street Los Angeles, CA ¹ 0.072 miles SW 380 feet SW	Not Reported	n/a	n/a	Central Plants, Inc. 715 W 3 rd Street 0.084 miles East 444 feet East	Not Reported	n/a	n/a	Central Plants, Inc. 715 W 3 rd Street 0.084 miles East 444 feet East	3,175	ASD for Thermal Radiation for People (ASDPPU) is 447 feet ASD for Thermal Radiation for Buildings (ASDBPU) is 85 feet	No	US Bank NA 221 S Figueroa Street 0.088 miles NNE 465 feet NNE	Not Reported	n/a	n/a	Union Bank Plaza	Not Reported	n/a	n/a
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US Bank NA 221 S Figueroa Street 0.088 miles NNE 465 feet NNE	Not Reported	n/a	n/a																							
Union Bank Plaza	Not Reported	n/a	n/a																							

¹ All of the ASTs are within the City limits of Los Angeles, California.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations			
		445 S Figueroa Street 0.090 miles SW 477 feet SSW			
		Figueroa Courtyard LLC 241 S Figueroa Street 0.101 miles North 533 feet North	Not Reported	n/a	n/a
		Hines VAF II 444 South Flower Street 0.114 miles South 602 feet South	Not Reported	n/a	n/a
		Are all ASTs located at an acceptable separation distance from the site?			No
		Will future residents be subjected to Explosive and/or flammable hazards?			No
		Out of the seven ASTs within 1/8 mile, only one has the size reported of 3,175 gallons. The ASD for Thermal Radiation for People (ASDPPU) is 447 feet; the tank is located about 444 feet from the AST. However, there is an intervening tower building that would effectively block any blast from the AST. There is no impact of this AST on the proposal. Likewise, the remaining ASTs at distances further than an eighth of a mile will face obstacles of intervening tower buildings that comprise the downtown core of Los Angeles. No adverse impacts were identified. Planned ASTs The City of Los Angeles planning website was consulted. No nearby new construction projects that may utilize ASTs were identified. Conclusion The building and future residents will not be located within any blast radius a mile of any existing or planned Above-ground Storage Tank. Source Documentation: (3) (7) (24) (25) (26) (27) (Appendix E)			

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No ☐ ☒	The project is rehabilitation of an existing building. There are no impacts to farmlands. Source Documentation: (3) (4) (28)
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No ☐ ☒	The site is not located in a Special Flood Hazard Area that would require flood insurance. The project site is entirely located within Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) area designation Zone X: Areas of Minimal Flooding. The project site is not located within a 100-year floodplain or 500-year floodplain. The project is not a Critical Action. The County of Los Angeles is a participant in the National Flood Insurance Program (NFIP) and property owners should be encouraged to purchase flood insurance; however, flood insurance is not required. Source Documentation: (11) (Appendix C)
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No ☒ ☐	Undertaking The 333 Flower project, also known as Sky Castle, (project, Undertaking) will be the first phase of an adaptive reuse project located at the World Trade Center building Downtown Los Angeles (333 South Figueroa Street, Los Angeles, CA 90071). The development will convert the building's two concourse levels – positioned above four levels of above-ground parking – into 241 affordable housing units. The project will serve households earning between 30% and 80% of the Area Median Income (AMI) and will include 179 one-bedroom units, 57 two-bedroom units and five three-bedroom units. The area of work will be limited to the existing building, specifically, the two concourse levels and the basement level. The interiors of the two concourse levels will be adaptively reused from commercial offices to residential units. In the basement, select areas of concrete slab will be removed, soil removed, and new or enlarged concrete foundations added. All other areas of the existing building, including the existing office tower levels, are not part of the project. The project

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		may require demolition, reconstruction and trenching work required to provide utilities to the site and to upgrade any required facilities that may be in the public right-of-way, including curb, gutter and sidewalk as needed. The project will be affordable to households earning between 30 and 80 percent of Los Angeles County Area Median Income (AMI). Area of Potential Effects Based on research of the property by GPA Consulting (GPA) and Langan Engineering and Environmental Services, Inc. (Langan) of State Historic Preservation Officer (SHPO) records, local government tax records, the California Historical Resources Information System research and field survey, the Area of Potential Effects (APE) has been defined as the boundary of the project property for both direct and indirect effects. The project is rehabilitation. There is some ground disturbance required in the basement. The maximum horizontal extent of the APE is 3.68 acres (160,139.5 square feet) coinciding with the boundaries of Assessor Parcel Number (APN) 5151-011-BRK associated with the project site. The maximum vertical extent of the APE ranges from five to six feet deep at limited locations within the existing basement for excavation associated with new or enlarged foundations, and up to 69 feet, 4 inches high, which is the upper limit of the areas within the existing concourse levels to be converted to residential use. Evaluation An intensive field survey of the APE was conducted by GPA Consulting (GPA) in July 2018 and September 2019. All buildings and structures on the project site were reviewed and photographed. Buildings and areas adjacent to the project site were also reviewed in the field to verify the boundaries of the APE. There are no historic properties present within the APE. One resource within the APE, the World Trade Center, was evaluated under the National Register criteria and determined not eligible for listing on the National Register due to a lack of significance under any of the criteria. The property is not eligible for listing in the National Register pursuant to 36 CFR 800.4(c)(2) and the suggested NRHP Status Code is 6Z, <i>Ineligible by</i>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<i>Survey</i> (see attached DPR523 form). Therefore, the appropriate finding for the undertaking recommended by GPA is “No Historic Properties Affected,” consistent with 36 CFR 800(4)(d)(1). Archaeology A cultural resources records search was completed at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton, which is the local California Historic Resources Information System (CHRIS) facility. Results of the cultural resources records search indicate that twenty-six (26) cultural resource studies have been conducted within 0.25 mile of the APE between 1978 and 2013. Of the reports on file with CHRIS, three (3) address portions of the APE and one (1) addresses an adjacent property. SCCIC records indicate that a total of fourteen (14) previously recorded cultural resources have been recorded within 0.25 mile of the APE, none of which are located within the APE. Of these resources all are historic built environment, non-archaeological resources. The potential to encounter cultural deposits containing archaeological resources/historic properties or human remains within soils from the current grade to the proposed depth of disturbance is unlikely. The potential to encounter intact cultural deposits is highly unlikely from the current grade to depths between one and seventeen feet below the current ground surface due to the presence of artificial fill and previous disturbance of soils. Field Survey A field survey was conducted in 2025. At the time the survey was conducted, the APE was almost entirely developed including structures and paved areas. Periodic patches of exposed soil at the base of the structures and landscape beds provided the only opportunities for ground surface visibility. Due to the presence of structures and pavement within approximately 95 percent of the APE, only 5 percent of the site was able to be surveyed. Of the 5 percent surveyable area, fair to good ground surface visibility (20-40 percent) was available. No prehistoric or historic archaeological cultural

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		materials were identified as a result of the survey. Soils observed on site appeared to consist of fill materials and placed topsoils; therefore, observed soils were not consistent with the mapped USDA soils series' characteristics mapped for the APE. Native American Tribes HUD's Tribal Directory Assessment Tool reports three (3) Federally-recognized Native American tribal contacts for Los Angeles County. The Native American Heritage Commission (NAHC) conducted a search of the Sacred Lands File (SLF) that returned positive results. The NAHC provided a list of tribes, and all were mailed a letter inviting consulting under Section 106 on September 12, 2025. Three tribes consulted with CalHFA on the project. The Fernandeño Tataviam Band of Mission Indians determined that neither project intake nor consultation with the tribe was required. The Gabrielino Tongva Indians of California tribe initially requested a monitor be present, but after studies were provided and multiple attempts to contact the tribe were unsuccessful, consultation was concluded. The Gabrieleño Band of Mission Indians - Kizh Nation consulted on the project and requested a tribal monitor be present during ground-disturbing activities. A Tribal Monitoring and Mitigation Plan/executed contract between the Tribe and project sponsor is a condition for loan closing. Conclusion The project has no potential to affect historic properties. There are no properties eligible for listing in the National Register of Historic Places in the Area of Potential Effects. Further, the project has a low potential for accidental discovery. As such, a finding of no historic properties affected for the Undertaking pursuant to 36 CFR 800.4(d)(1) was recommended. Consultation On November 13, 2025, the Agency Official, California Housing Finance Agency (CalHFA), agreed with the description of the Undertaking and Area of Potential Effects. Further that no historic properties were identified within it; therefore, a finding of no historic properties was appropriate. CalHFA then initiated consultation with

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		the State Historic Preservation Officer with letter and package of information sent via E-mail to ohp@calshpo.ca.gov per COVID protocol. On December 4, 2025, the State Historic Preservation Officer, Julianne Polanco replied with a letter of no objection to the determination of <i>no historic properties affected</i>. This concludes Section 106. <i>Mitigations Required:</i> TCR-1. <u>Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities</u> The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be present prior to the commencement of initial ground disturbance at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work); and during any required additional ground disturbance that digs deeper than initial excavation. “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, tree removal, boring, grading, excavation, drilling, and trenching. In the event of a discovery, it is agreed that all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume. The area may be flagged off until the resource has been fully assessed by the Tribe monitor and/or Tribe archaeologist. Work may still continue in other areas. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. TCR-2. <u>Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)</u> Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The applicant’s archaeologist of record will also be informed if such a discovery is made of any nature. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe’s sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		TCR-3. <u>TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects</u> Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance. Source Documentation: (1) (3) (5) (7) (29) (30) (31) (32) (33) (34) (35) (36) (Appendix F)
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No ☐ ☒	The proposed project will be the conversion of office space to 241 multi-family residences. The City of Los Angeles, Department of Building and Safety shall ensure that Noise created during the time of construction shall be in full compliance with all rules under 24 CRF 51B that govern noise abatement and control by encouraging land use patterns that will provide a suitable separation between housing and major noise sources, prohibit HUD support for housing with unacceptable noise exposure, and ensure structural and other noise attenuation measures, where needed. During the construction period, the project proponent would comply with the Los Angeles Municipal Code, as specified in LA City Noise

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		Ordinance Nos. 144.331 and 161.574, to ensure that temporary construction noise will not significantly impact the adjacent neighborhood. This project is located 11.1 miles east of the Santa Monica Airport and 10.9 miles northeast of Los Angeles International Airport. As such, this project is located outside of the contour lines of these two airports exceeding the 65 dB noise level. Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.² This includes traffic on the Harbor Freeway (SR-110 to the west and local arterials like 3rd and 4th Streets. The 24-hour Community Noise Equivalent Levels (CNEL) at the Project Site is 62.3 dBA along the 3rd Street frontage. The U.S. Department of Housing and Urban Development (HUD) requires that housing projects receiving federal assistance not be located in areas where the day-night average sound level (DNL) exceeds 65 dB without appropriate mitigation. This standard is outlined in 24 CFR Part 51 Subpart B – Noise Abatement and Control, which establishes environmental criteria and standards for noise. Specifically, 24 CFR § 51.103(a) states that a DNL of 65 dB is the threshold of acceptability, and projects in locations with noise levels at or above this threshold must undergo additional review and may require noise attenuation measures. Areas with noise levels of 75 dB DNL or higher are considered "unacceptable," and HUD funding is generally discouraged or disallowed unless there are special circumstances and effective mitigation strategies. These requirements are designed to ensure that federally funded housing provides a suitable living environment for residents. The site's existing 62.3 dB CNEL noise level is less than the 65 dB DNL standard established by HUD, assuming that the CNEL and DNL noise standards are generally equivalent. With compliance with Title 24

² World Health Organization, <https://www.who.int/docstore/peh/noise/Comnoise-2.pdf> accessed March 18, 2021.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		acoustical requirements for new development, the Proposed Project would meet and exceed HUD's recommended interior noise limit of 45 dB. During the 24 months of demolition, building construction, and application of architectural coatings, noise levels would generally peak during the grading phase, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of dirt. Because the Project's construction activity would occur between 7:00 A.M. and 7:00 P.M. Monday through Friday (and between 8:00 A.M. and 6:00 P.M. on Saturdays), noise from these activities would not be considered significant under the City of Los Angeles' guidance, as there is no numerical threshold above ambient levels for construction during these hours, as documented in the City's 2024 Construction Noise and Vibration Updates to Thresholds and Methodologies. The Project would also comply with applicable portions of the City's Environmental Protection Measures from Environmental Impact Reports for adopted Community Plan updates that call for best practices measures to reduce construction noise and off-site exposure at sensitive receptors. Finally, construction noise levels at any analyzed sensitive receptor would not exceed 72.8 dBA $L_{eq(8-hour)}$, which is thereby below the City's 80 dBA $L_{eq(8-hour)}$ threshold of significance at sensitive uses. The Project's long-term operations will not substantially elevate ambient noise levels by 5 dBA CNEL. The residential project would not have heavy-duty machinery or equipment that would substantially elevate noise levels in the area. With regard to ground borne vibration, construction activities would not exceed 0.022 in/sec Peak Particle Velocity (PPV) at nearby buildings and structures, below the 0.3 in/sec PPV threshold of significance for Category II (engineered concrete and masonry buildings) structures nearby. As a result, vibration impacts would be considered less than significant. Source Documentation: (3) (7) (12) (37) (Appendix G and H)

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No ☐ ☒	The project has no potential to affect a sole source aquifer. There are no aquifers subject to a Memorandum of Understanding between U.S. Environmental Protection Agency (EPA) and HUD in Los Angeles County. The project is rehabilitation; there are no impacts to Sole Source Aquifers anticipated as a result of the project. Source Documentation: (38) (39) (Appendix H)
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No ☐ ☒	According to the United States Fish and Wildlife Service (USFWS) Geospatial Wetlands Information online map, there are no mapped wetlands on the Subject Property. Additionally, no evidence of wetlands, settling ponds, lagoons, surface impoundments, natural catch-basins, or potential wetland features (water marks on tree trunks, drift lines, buttressed roots, etc.) were observed at the Subject Property during this investigation and no evidence of potential water features were noted on the reviewed historical source documents. The site does not appear on the National Wetlands Inventory database. The site does not contain any on-site wetlands or jurisdictional waters. The project is rehabilitation. No consultations are required. Source Documentation: (4) (23) (Appendix C)
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No ☐ ☒	No Wild and Scenic Rivers are located within Los Angeles County. The project will not affect any Wild and Scenic River. Source Documentation: (40) (Appendix H)
Environmental Justice Executive Order 12898	Yes No ☐ ☒	Under Executive Order 12898, issued in 1994, federal agencies, including HUD, must identify and address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations. While the order mandates the consideration of environmental justice in project siting, it does not establish specific thresholds for what constitutes a "significant" health risk. HUD relies on existing environmental standards or USEPA risk

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		guidelines. The USEPA's AirToxScreen mapping tool estimates a total cancer risk of 50 in a million on the Project Site (Census Block ID 060372075022001). This lifetime cancer risk of 50 in a million (5×10^{-5}) is generally low and not deemed significant enough to trigger mitigation or relocation. Therefore, placing the proposed housing development in an area with this level of risk would typically not be considered a violation of Executive Order 12898. Furthermore, the proposed project with the new construction of the apartment building with 241 units will provide affordable housing and supportive housing to low-income individuals. This project will be consistent with the surrounding Downtown area and is not expected to result in a significant alteration of the demographic or socioeconomic character in the area. In fact, the project will help by providing needed supportive housing in the area. This is an opportunity to offer safe clean and affordable supportive housing to low-income individuals. The opportunity for these persons to live and enjoy all the amenities of this community within Downtown Los Angeles is a great benefit to this community and the residents that live here. Source Documentation: (12) (Appendix H)

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<u>Context</u> The proposed Project, located at 333 Flower Street (Assessor's Parcel Number [APN] 5151-011-022), is situated within public land Section 00 of Township 1 South, Range 13 West on the Hollywood, California 7.5-minute USGS Quadrangle. Based on the project location within District 14 in the City of Los Angeles, the proposed project is subject to the Downtown Community Plan (Community Plan). The Downtown Community Plan Area (CPA) is comprised of a collection of neighborhoods, including the Arts District, Chinatown, Civic Center, Fashion District, Financial District, Little Tokyo, Historic Core, Skid Row, and Victor Heights. The Bunker Hill Specific Plan encompasses Districts 1, 9 and 14. District 14 is bordered by Silver Lake and Echo Park to the north, Westlake to the west, Boyle Heights to the east, and Southeast Los Angeles to the south. <u>Land Use and Zoning</u> Pursuant to Government Code Section (GCS §) 65583(c)(1)(A), Los Angeles was required undergo a rezoning program because the City's 2021-2029 Housing Element could not identify adequate sites to meet its Regional Housing Needs Allocation (RHNA) of 456,643 housing units for groups at all household income levels. As part of the rezoning program, GCS § 65583.2(h) required the City to identify specific sites (hereafter referred to as Lower Income Rezoning Housing Element Sites) where qualifying Housing Development Projects would be subject to minimum density requirements and receive streamlined approval. The Housing Element Sites and Minimum Density Ordinance (HESMD), which took effect on February

Environmental Assessment Factor	Impact Code	Impact Evaluation
		12, 2025, implemented these requirements for sites identified by this Zoning Information File. Pursuant to state law and Los Angeles Municipal Code (LAMC) Ch. 1 § 16.70 F.2 and Ch. 1A § 9.2.6, Housing Development Projects located on Lower Income Rezoning Housing Element Sites shall be subject to Ministerial Approval if they meet the following requirements: 1. At least 20 percent of the dwelling units are reserved for Lower Income Households, as defined in California Health and Safety Code § 50079.5.2 2. The project is developed at a minimum density of at least 20 dwelling units per acre (one dwelling unit per 2,178 square feet of lot area), inclusive of any Accessory Dwelling Units. Please note, this requirement applies to every Housing Development Project proposed on a Lower Income Rezoning Housing Element Site. Housing Development Projects eligible for Ministerial Approval pursuant to HESMD will not be subject to any discretionary review procedures or review under the California Environmental Quality Act (CEQA) and must be processed as a “use by right” pursuant to GCS § 65583.2(i). Additional information on this streamlined process can be found in LAMC Ch. 1 § 16.70 F.2 and Ch. 1A § 9.2.6. <u>Project Impacts</u> The project is rehabilitation/adaptive re-use of two floors of an existing building complex known as the World Trade Center, Los Angeles from commercial space to residential housing units. As discussed above, as an affordable housing project, approval of the proposal is ministerial in nature and can be built by-right. No new structures will be constructed; there is no or minimal visual impact to Downtown Los Angeles. Source Documentation: (1) (3) (5) (26) (41) (42) (Appendix H)
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The project is adaptive re-use of two floors of an existing building or considered rehabilitation. Ground disturbance includes basement work where areas of concrete slab will be removed, soil removed, and new or enlarged concrete foundations added. The project may require upgrade of

Environmental Assessment Factor	Impact Code	Impact Evaluation
		utilities and therefore ground disturbance in the public right-of-way is also included in the project. <i>A Geotechnical Engineering Investigation</i> was prepared for the project in 2022. Excerpts follow. Soil Suitability The Project Site is located at 350 S. Figueroa Street, in the City of Los Angeles, California. The Project Site is occupied by a development known as the “World Trade Center Los Angeles”, and occupies the entire city block. The site is bounded by W. 3rd Street to the northeast, by S. Flower Street to the southeast, by W. 4th Street to the southwest, and by S. Figueroa Street to the northwest. . The subject property contains a development of three subterranean parking levels, extending on the order of 30 feet below the surrounding street elevations, with three above grade parking levels. On top of the garage is a commercial development with a two-story office concourse and an 8-story “L” shaped office building on top of the concourse. Between 1 and 6 feet of existing fill materials were encountered in the explorations, excavated from the lowest garage level. Up to 17½ feet of existing fill materials was encountered in Boring B3, which was excavated from an existing planter area at the exterior street elevation, along W. 4th Street. Fill materials underlying the subject site consist of silty sands, sands, and sandy silts, which are yellowish and grayish brown to dark brown in color, moist to wet, medium dense to dense, stiff, and fine grained. Native soils consist primarily of sandy silts and silty clays, silty sands and sands, which are yellowish to dark grayish brown in color, moist, very dense, stiff to very stiff, fine grained. The native soils are underlain by bedrock, consisting of shale and claystone of the Puente Formation. The upper layer of bedrock is weathered, brown to gray in color, moist, moderately hard. The bedrock becomes dark gray and hard with increased depth. Minor seepage of groundwater was encountered at depths of 2 and 12 feet in B1 and B2, respectively, which were excavated from the lowest subterranean level. Very minor water seepage was also encountered in the soil sample taken at an approximate depth of 31 feet below

Environmental Assessment Factor	Impact Code	Impact Evaluation
		the street elevation in Boring B3. These minor seepage layers are primarily found at the soil/bedrock contact. <u>Seismic Hazards and Design Considerations</u> The primary geologic hazard at the site is moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults. The potential for other earthquake-induced hazards was also evaluated including surface rupture, liquefaction, dynamic settlement, inundation and landsliding. <u>Surface Rupture</u> Ground rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on research of available literature, no known active or potentially active faults underlie the subject site. In addition, the subject site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, the potential for surface ground rupture at the subject site is considered low. <u>Liquefaction</u> Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. The Seismic Hazards Maps of the State of California (CDMG, 1999), classifies the site as part of the potentially “Liquefiable” area. By nature, the underlying bedrock are considered to be non-liquefiable. Due to the minor water seepage observed, and the bedrock underlying the Project Site, the potential for liquefaction occurring at the site is considered to be remote. <u>Dynamic Dry Settlement</u> Some seismically-induced settlement of the proposed structures should be expected as a result of strong ground-shaking, however, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur. <u>Tsunamis, Seiches and Flooding</u>

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		Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landslide, or volcanic eruption. Review of the County of Los Angeles Flood and Inundation Hazards Map, Leighton (1990), indicates the site does not lie within the mapped tsunami inundation boundaries. Seiches are oscillations generated in enclosed bodies of water which can be caused by ground shaking associated with an earthquake. No major water-retaining structures are located immediately up gradient from the project site. Therefore, the risk of flooding from a seismically-induced seiche is considered to be remote. Review of the County of Los Angeles Flood and Inundation Hazards Map, Leighton (1990), indicates the site does not lie within mapped inundation boundaries due to a seiche or a breached upgradient reservoir. <u>Conclusion</u> Based upon the exploration, laboratory testing, and research, it is the finding of Geotechnologies, Inc. that the retrofit and adaptive reuse of the existing structure is considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented in their report are followed and implemented during construction Slope The topography surrounding the Project Site generally descends very gently to the southeast. Based on the topographic survey by KPFF, there is an estimated elevation difference of approximately 10 feet across the Project Site for an overall site gradient on the order of 60 to 1 (horizontal to vertical). The topography onsite as well as in the immediate vicinity of the site is relatively level with very minor elevation changes. Additionally, the CGS Seismic Hazards Zones Map of the Hollywood Quadrangle indicates that the site is not located within an Earthquake-Induced Landslide Zone. Based on these considerations, the potential of landslides adversely affecting the proposed development is considered to be low. Erosion As a rehabilitation project, erosion is expected to be minimal.

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		Drainage/Storm Water Runoff The project will not result in the addition of impervious surfaces that could cause offsite flooding or overwhelm stormwater drainage facilities. There is no impact in this regard. Conclusion The project is rehabilitation of existing buildings. The slope, drainage or storm drain system will not be altered in any way. Runoff will not be increased by the project. A Storm Water Pollution Prevention Plan (SWPPP) is not required. An Erosion Control Plan is not required. Site drainage is already directed to existing storm drain facilities. There is no impact in this regard. Source Documentation: (1) (3) (28) (43) (44) (Appendix H)
Hazards and Nuisances including Site Safety and Noise	2	This project is located 11.1 miles east of the Santa Monica Airport and 10.9 miles northeast of Los Angeles International Airport. As such, this project is located outside of the contour lines of these two airports exceeding the 65 dB noise level. During the construction period, the project proponent would comply with the Los Angeles Municipal Code, as specified in LA City Noise Ordinance Nos. 144.331 and 161.574, to ensure that temporary construction noise will not significantly impact the adjacent neighborhood. Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air. This includes traffic on the Harbor Freeway (SR-110 to the west and local arterials like 3rd and 4th Streets. The 24-hour Community Noise Equivalent Levels (CNEL) at the Project Site is 62.3 dBA along 3rd Street. The U.S. Department of Housing and Urban Development (HUD) requires that housing projects receiving federal assistance not be located in areas where the day-night average sound level (DNL) exceeds 65 dB without appropriate mitigation. This standard is outlined in 24 CFR Part 51 Subpart B – Noise Abatement and Control, which establishes environmental criteria and standards for noise. Specifically, 24 CFR § 51.103(a) states that a DNL of 65 dB is the threshold of acceptability, and projects in locations with noise levels at or above this threshold must undergo additional review and may require noise attenuation measures. Areas

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		with noise levels of 75 dB DNL or higher are considered "unacceptable," and HUD funding is generally discouraged or disallowed unless there are special circumstances and effective mitigation strategies. These requirements are designed to ensure that federally funded housing provides a suitable living environment for residents. The site's existing 62.3 dB CNEL noise level is less than the 65 dB DNL standard established by HUD, assuming that the CNEL and DNL noise standards are generally equivalent. With compliance with Title 24 acoustical requirements for new development, the Proposed Project would meet and exceed HUD's recommended interior noise limit of 45 dB. During the 24 months of demolition, building construction, and application of architectural coatings, noise levels would generally peak during the demolition phase, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of dirt. Because the Project's construction activity would occur between 7:00 A.M. and 7:00 P.M. Monday through Friday (and between 8:00 A.M. and 6:00 P.M. on Saturdays), noise from these activities would not be considered significant under the City of Los Angeles' guidance, as there is no numerical threshold above ambient levels for construction during these hours, as documented in the City's 2024 Construction Noise and Vibration Updates to Thresholds and Methodologies. The Project would also comply with applicable portions of the City's Environmental Protection Measures from Environmental Impact Reports for adopted Community Plan updates that call for best practices measures to reduce construction noise and off-site exposure at sensitive receptors. Finally, construction noise levels at any analyzed sensitive receptor would not exceed 71.5 dBA Leq(8-hour), which is thereby below the City's 80 dBA Leq(8-hour) threshold of significance at sensitive uses. The Project's long-term operations will not substantially elevate ambient noise levels by 5 dBA CNEL. The residential project would not have heavy-duty machinery or equipment that would substantially elevate noise levels in the area. Source Documentation: (3) (37)
Energy Consumption	2	The project would meet current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulation as enforced by the City of Los Angeles.

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		The project converts underutilized space from commercial to residential. As the project is rehabilitation, there is no impact in this regard. The project does not represent a wasteful use of energy. Source Documentation: (1) (3)
SOCIOECONOMIC		
Employment and Income Patterns	1	According to HUD, the maximum number of residents at the site will be 857 people. The population of Los Angeles, California is estimated to be 3.88 million as of 2020. An additional 838 people would represent 0.0002 percent of the local population. In fact, the future residents are likely current residents of Los Angeles and will not cause an increase in population. The project is not of sufficient scope of impact employment and income patterns. No adverse impacts were identified. In fact, the project will locate residents within the dense Downtown area and could provide connect low-income residents of the project to local (walkable) jobs. Locating residents near jobs and reducing vehicle trips reduces greenhouse gas emissions and criteria pollutants. There is a small benefit in this regard. Source Documentation: (1) (3)
Demographic Character Changes, Displacement	3	Demographic Character Changes At 241 units in Downtown Los Angeles, the project is not anticipated to induce substantial growth in population in the area. The project will help to address the need for housing identified above in the <i>Statement of Purpose and Need</i>. According to HUD, the maximum number of residents at the site will be 857 people. The population of Los Angeles, California is estimated to be 3.88 million as of 2020. An additional 857 people would represent 0.0002 percent of the local population. In fact, the future residents are likely current residents of Los Angeles and will not cause an increase in population. The project will not significantly alter the racial, ethnic, or income segregation of the area's housing. It will not result in physical barriers or difficult access which will isolate a particular neighborhood or population group, making access to local services, facilities, and institutions or other parts of the city more difficult. The development of the project at this site

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		does not create a concentration of low income or disadvantaged people, in violation of HUD standards and Environmental Justice policies. Displacement The Uniform Relocation Act (URA), passed by Congress in 1970, establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. Section 205 of the URA requires that, "Programs or projects undertaken by a federal agency or with federal financial assistance shall be planned in a manner that (1) recognizes, at an early stage in the planning of such programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of such problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion." The Uniform Relocation Act (URA), passed by Congress in 1970, establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. Section 205 of the URA requires that, "Programs or projects undertaken by a federal agency or with federal financial assistance shall be planned in a manner that (1) recognizes, at an early stage in the planning of such programs or projects and before the commencement of any actions which will cause displacements, the problems associated with the displacement of individuals, families, businesses, and farm operations, and (2) provides for the resolution of such problems in order to minimize adverse impacts on displaced persons and to expedite program or project advancement and completion." The project is rehabilitation and conversion of two concourse floors of an existing building from commercial/office space to residential housing units. Some units are occupied. A conforming relocation plan is required.

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		<i>Mitigations Required:</i> RL1. The project will involve relocation of commercial tenants. The project is subject to the Uniform Relocation Act (46 U.S.C. § 4600 et seq.), passed by Congress in 1970, its implementing regulations (49 C.F.R.) Part 24); the California Relocation Assistance Law, California Government Code Section 7260 et seq (the “CRAL”) and the California Relocation Assistance and Real Property Acquisition Guidelines, Title 25, California Code of Regulations, Chapter 6, Section 6000 et seq., and the City of East Palo Alto Municipal Code Chapter 14.02 (Ordinance No. 374), Tenant Protections, (jointly the “Rules and Regulations”). A conforming relocation plan shall be prepared to the extent as required by applicable law. Source Documentation: (1) (3) (7) (45)
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	Educational Facilities The project is to develop 241 affordable housing units that will generate a maximum population of up to 857 people, some of whom may be school-aged children. A significant impact would occur if the additional students require new facilities be constructed or additional staff be hired. The Sky Castle project involves the adaptive reuse of the World Trade Center building to create 241 affordable housing units (179 one-bedroom, 57 two-bedroom, and 5 three-bedroom units). Based on the student generation rates utilized in the Los Angeles Unified School District (LAUSD) Developer Fee Justification Study (cited in the Downtown Plan DEIR), the project is estimated to generate approximately 106 new students: • Elementary (Grades K-5): Approximately 55 students (0.2269 students per unit) • Middle School (Grades 6-8): Approximately 15 students (0.0611 students per unit) • High School (Grades 9-12): Approximately 31 students (0.1296 students per unit) • Special Day Class (SDC): Approximately 5 students (0.0194 students per unit)

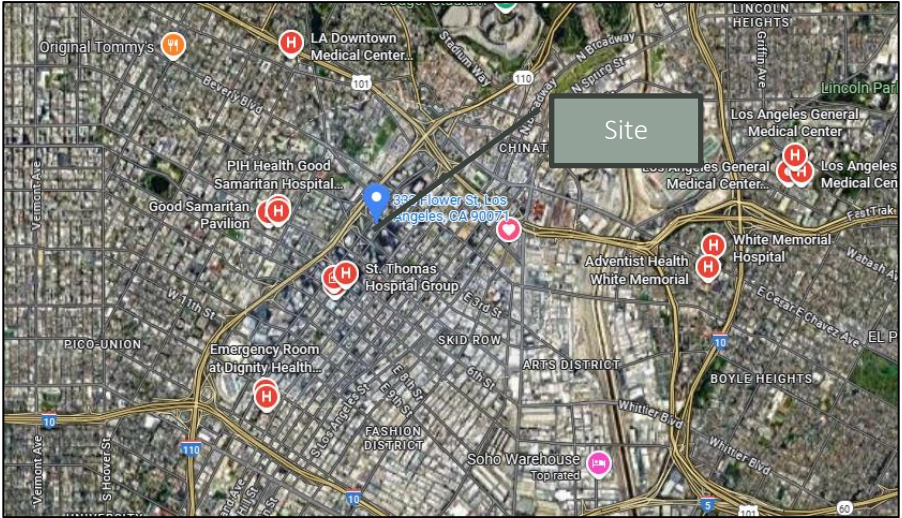
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		<u>Nearby Educational Facilities</u> The project site at 333 South Flower Street is located within the Downtown Plan Area and is served by the Los Angeles Unified School District (LAUSD). Based on the project's location in the Financial District/Bunker Hill area, the schools likely to serve the project include: • Elementary School: Ninth Street Elementary (835 Stanford Ave) or Castelar Street Elementary (840 Yale St). • Middle School: John H. Liechty Middle School (650 S Union Ave). • High School: The site is located within the Belmont Zone of Choice, which allows students to select from various high schools including the Ramon C. Cortines School of Visual and Performing Arts (450 N Grand Ave), which is located in close proximity to the project site, as well as Belmont High School and the Edward R. Roybal Learning Center. <u>Capacity Analysis</u> According to the Downtown Plan DEIR (Table 4.13-8), schools serving the Downtown area face significant capacity constraints. Projections for the 2021-2022 school year indicate the following: • Elementary Schools: Both Ninth Street Elementary and Castelar Street Elementary are projected to have seating shortages (57 and 65 seats, respectively) and are classified as overcrowded. • Middle Schools: Liechty Middle School is projected to have a significant seating shortage of over 700 seats and is classified as overcrowded. • High Schools: The Belmont Zone of Choice is projected to have a net seating shortage of 262 seats and is classified as overcrowded. While the aggregate elementary capacity for the entire Downtown Plan Area showed some availability in the 2016-2017 baseline, the specific schools likely to serve this project and the secondary schools (Middle and High) serving the area are projected to operate over capacity. <u>Finding</u> Finding: The project will generate additional demand on local school facilities that are currently projected to be operating at or above

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		capacity. However, pursuant to California Government Code Section 65995 and Senate Bill 50, the payment of statutory school impact fees is deemed to provide full and complete mitigation of school facilities impacts. The project applicant will be required to pay all applicable school fees to the Los Angeles Unified School District (LAUSD) prior to the issuance of building permits. These fees are used to fund the construction of new classrooms and school facilities. With the payment of these fees, the project is considered to have mitigated its impact on educational facilities to a level that is less than significant. Therefore, the project is in compliance with HUD and NEPA standards regarding public services. Cultural Facilities The Los Angeles Public Library system operates 72 library branches. The Los Angeles Public Library system (LAPL) is a public library that holds more than six million volumes. With around 19 million residents in the Greater Los Angeles area, it serves the largest metropolitan population of any public library system in the United States. Services and programs offered include ADA services (services, collections, and resources for people with disabilities); adult literacy programs; homeless resources; STEAM = Science + Technology + Engineering + Art + Math; jobs and money (library resources, websites, and referrals to assistance available in-person and by telephone for job seekers, entrepreneurs, and for everyone managing their money); Street Fleet (a mobile outreach unit brings the library to City of Los Angeles communities that have challenges accessing their local branches); and many more. The nearest library is Los Angeles Central Library, located at 630 West 5th Street, 0.3 miles south of the project site. The Library is an eight-minute walk, five-minute bike ride and a five-minute transit ride away. Residents may take Los Angeles Department of Transit (LADOT) Route A, Little Tokyo/City West along Flower Street one stop and then walk a block to the Library. The Central Library is the third largest central library in the nation, housing more than 2.6 million books and 10,000 magazine subscriptions. The Los Angeles Zoo “aims to inspire an appreciation of wildlife through exhibits and education” and covers 133 acres. The Los Angeles Zoo and Botanical Gardens opened on November 28, 1966. The Zoo is home to more than 2,100 mammals, birds, amphibians, and reptiles representing

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		more than 270 different species, of which more than 58 are endangered. In addition, the Zoo's botanical collection comprises several planted gardens and over 800 different plant species with approximately 7,000 individual plants. The Zoo receives nearly 1.8 million visitors per year and is owned and operated by the City of Los Angeles. The Zoo is located at 5333 Zoo Drive, Los Angeles, about an hour on public transit and 14 minutes by car. Here are the top 10 cultural facilities near the project, most of which are just a short walk away along Grand Avenue: 1. Walt Disney Concert Hall (~0.2 miles) Home to the Los Angeles Philharmonic, this architectural landmark designed by Frank Gehry is famous for its stunning stainless steel curves and world-class acoustics. 2. The Broad (~0.2 miles) A contemporary art museum known for its unique "veil and vault" architecture and free general admission. It houses an extensive collection of postwar and contemporary art. 3. Museum of Contemporary Art (MOCA), Grand Avenue (~0.2 miles) Located just across from The Broad, this is MOCA's main location, featuring thousands of works of contemporary art created since 1940. 4. The Music Center (~0.3 miles) This is one of the largest performing arts centers in the US. It includes three major venues (in addition to Disney Hall): a. Dorothy Chandler Pavilion (Opera/Dance) b. Ahmanson Theatre (Theater/Broadway) c. Mark Taper Forum (Intimate Theater) 5. Roy and Edna Disney/CalArts Theater (REDCAT) (~0.2 miles) Located inside the Walt Disney Concert Hall complex, this is a multidisciplinary center for innovative visual, performing, and media arts. 6. Los Angeles Central Library (~0.2 miles) The main branch of the LA Public Library system is a historic architectural gem (Goodhue building) featuring the Maguire Gardens, rotunda murals, and extensive special collections.

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		7. Colburn School (~0.3 miles) A prestigious performing arts school for music and dance. It hosts numerous public performances in venues like Zipper Hall. 8. Angels Flight Railway (~0.3 miles) While primarily a transportation landmark, this historic funicular (the "shortest railway in the world") is a significant cultural icon of downtown Los Angeles, connecting Bunker Hill to the Historic Core. 9. Gloria Molina Grand Park (~0.4 miles) A 12-acre civic park that stretches from the Music Center to City Hall. It serves as a cultural gathering place for festivals, concerts, and community events. 10. The Grammy Museum (~0.9 miles) Located slightly further south at L.A. Live, this interactive museum is dedicated to the history and winners of the Grammy Awards. (Note: The FIDM Museum is closer, at ~0.6 miles, if you prefer fashion exhibits). The City and County of Los Angeles are rich in cultural facilities. With convenient public transit available these facilities are accessible to residents who may not own a vehicle. No adverse impacts were identified. Source Documentation: (3) (7) (43) (44) (46) (47)
Commercial Facilities	2	The area surrounding the site is a mix of residential and commercial uses in Downtown Los Angeles.

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		 Figure 5 Grocery stores and markets near the site (Cart Icons) The nearest full-service grocery store with pharmacy is Ralphs, 645 West 9th Street, 0.7 miles north, a 16-minute walk or five-minute bicycle ride away. The store is accessible by Los Angeles Transit Bus Routes F and A and riders can arrive at the store in about 11 minutes. There are restaurants, theaters, banks, ATMs, and other commercial facilities nearby. The project site has a Walk Score of 98, Walker's Paradise (Daily errands do not require a car); Transit Score of 100, Rider's Paradise (World-class public transportation); and Bike Score of 61, Bikeable (some bike infrastructure). Conclusion The site is not located in a food desert. There are adequate existing commercial facilities to serve the additional 857 residents. No adverse impacts were identified. Source Documentation: (3) (7) (48) (Appendix H)
Health Care and Social Services	2	Health Care Nearby hospitals include the following: PIH Health Good Samaritan Hospital, 1225 Wilshire Boulevard (0.9 miles west of the site; a four-minute car ride away);

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		• Dignity Health – California Hospital Medical Center, 1401 S Grand Avenue (1.5 miles southwest of the site; a seven minute drive away); • St. Thomas Hospital Group, 700 Wilshire Boulevard (about a half mile southwest of the site; an 11-minute walk away or a two-minute drive); and • L.A. Downtown Medical Center – Downtown Campus, 1711 W Temple Street (1.6 miles north of the site; a six-minute car ride away). A hospital with an emergency room is less than half a mile away from the site. A map of nearby hospitals is shown below.  Figure 6 Nearby Hospitals (red H symbols) There are no adverse impacts to healthcare facilities or delivery systems anticipated because of the project as there are adequate medical facilities in the area to accommodate the residents. In fact, the chosen location is convenient for seniors to access health services. Social Services Los Angeles Department of Public Social Services offers cash assistance, job services, food and nutrition, homeless services, health care, community services and services for seniors and persons with disabilities. Services for seniors include in-home support services (IHSS), general relief, and restaurant meals. The Customer Service Center (CSC) is a “single point of contact” currently providing services to 33 District Offices for the following aid programs and languages: CalWORKs, CalFresh, Medi-Cal, and General

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		Relief, with services in Armenian, Cambodian, English, Spanish, Vietnamese, Mandarin, Cantonese, Farsi, Tagalog, Russian, and Korean. It is designed to optimize and enhance the quality of customer service, improve timeliness of case actions and service delivery to all DPSS participants. The nearest Los Angeles County Social Services Agency office to the site is located at 2601 Wilshire Avenue, Los Angeles, CA 90057, two miles from the project site. The Agency office is a 16-minute bus ride on route 20; the office is also accessible by bus routes 16, 18, and the Metro (heavy rail subway) B Line and Metro D Line. The project does not represent a significant change to the demographics of the area or on area social services as it serves existing populations. Implementation of the project represents a less than significant impact to social services. Source Documentation: (3) (7) (49) (50) (51) (52) (53)
Solid Waste Disposal / Recycling	2	<u>Project-Generated Waste</u> Development reasonably anticipated under the Downtown Plan is projected to increase the amount of solid waste generated in the Downtown Plan Area. Currently, the area generates approximately 1,071 tons of solid waste per day. With the implementation of the Downtown Plan, the total solid waste generation in the year 2040 is estimated to reach 2,204 tons per day. This constitutes a net increase of approximately 1,133 tons of solid waste per day (or 413,534 tons per year) above existing conditions. These estimates are conservative as they do not fully account for all current and planned diversion programs, such as the City's requirement to divert at least 50 percent of construction and demolition waste. <u>Existing Facility Capacity</u> The City of Los Angeles is served by regional landfills, with Sunshine Canyon Landfill serving as the primary disposal site within County limits. While previous assessments included Chiquita Canyon Landfill, that facility ceased accepting waste for disposal on January 1, 2025, shifting regional reliance to other facilities. As of the 2024 Countywide Integrated Waste Management Plan (CIWMP) Annual Report data, Sunshine Canyon maintains a permitted daily intake capacity of 12,100 tons per day. In 2024, the total in-county disposal was approximately 5.04 million tons, with an additional 5.72 million tons exported to out-of-county facilities in Orange,

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		Riverside, and Ventura Counties to manage demand. According to the Los Angeles County Public Works 2024 Assessment of Disposal Capacity, while the closure of Chiquita Canyon has reduced immediate in-county daily capacity, the County's long-term disposal needs are currently being met through a combination of existing in-county permits and expanded regional export agreements, provided that waste diversion and organic recycling goals continue to scale. <u>Finding</u> Finding: The project will not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. The projected net increase of 1,133 tons per day represents approximately 4 percent of the total available daily capacity at the landfills serving the City. Because the increase is well within the available capacity of existing facilities, and future development is required to comply with federal, state, and local statutes regarding waste reduction and recycling (such as AB 939 and the City's RENEW LA Plan), the impact on solid waste facilities is considered less than significant or not adverse. Source Documentation: (1) (42) (43) (44) (54)
Wastewater / Sanitary Sewers	2	<u>Project Wastewater Generation</u> The Sky Castle project, involving the adaptive reuse of the World Trade Center concourse levels into 241 residential units, will generate wastewater that requires treatment. Based on the wastewater generation rates provided in the Downtown Plan EIR (Table 4.17-1), which estimates approximately 149 gallons per day (gpd) per multi-family unit, the project is estimated to generate approximately 35,909 gallons per day (gpd) (or roughly 0.036 million gallons per day) of wastewater. This estimate is conservative as it reflects the gross generation of the new residential units and does not deduct the wastewater generation that was previously associated with the commercial office space being replaced. <u>Existing Facility Capacity</u> The project site is located within the service area of the Hyperion Sanitary Sewer System, which conveys wastewater to the Hyperion Water Reclamation Plant (HWRP) located in Playa Del Rey. According to the Downtown Plan EIR, the HWRP has a total treatment capacity of 450 million gallons per day (mgd). The plant currently processes an average

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		dry weather flow of approximately 275 mgd, leaving a remaining available treatment capacity of approximately 175 mgd. The system is designed to accommodate regional growth and operates well within its regulatory capacity limits. <u>Finding</u> Finding: The project's estimated wastewater generation of roughly 0.036 mgd represents a negligible fraction (approximately 0.02%) of the Hyperion Water Reclamation Plant's remaining daily capacity of 175 mgd. Consequently, the existing wastewater treatment infrastructure has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. The project will be required to ensure that local sewer lines connecting to the site have sufficient capacity to handle the specific flows from the building. This is verified through the City's Sewer Capacity Availability Request (SCAR) process prior to construction. With compliance with existing regulations, the impact on wastewater facilities is considered less than significant. Source Documentation: (1) (42) (43) (44) (55)
Water Supply	2	<u>Project Water Consumption</u> The Sky Castle project involves the adaptive reuse of the World Trade Center concourse to create 241 residential units. Based on the water demand rates utilized in the Downtown Plan EIR (Table 4.17-4 and Table 4.17-6), which estimates daily water use for multi-family residential units between approximately 202 and 219 gallons per day (gpd), the project is estimated to generate a water demand of approximately 52,851 gallons per day (or roughly 0.053 million gallons per day). This estimate is conservative as it reflects the gross demand of the new residential units and does not deduct the water demand previously associated with the commercial office space being replaced. Additionally, the project will be required to comply with the City's Green Building Code and the Low Impact Development (LID) Ordinance, which mandate the installation of water-saving fixtures and systems that further reduce actual potable water consumption. <u>Water Supply Availability</u>

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		The project site is served by the Los Angeles Department of Water and Power (LADWP). According to the Downtown Community Plan (DTLA 2040) EIR, LADWP's 2025 Urban Water Management Plan (UWMP) forecasts water demand and supply through the year 2050. The 2025 UWMP projects that current water supplies—augmented by expanded local groundwater remediation, the Operation NEXT water reuse initiative, and enhanced stormwater capture—will enable LADWP to reliably meet citywide demands for the next 25 years. The growth accommodated by the Sky Castle project is consistent with the growth projections of the Downtown Community Plan, which the EIR determined can be adequately served by LADWP's projected supplies during normal, single-dry, and multiple-dry years. The projected increase in water demand from the Downtown Plan Area remains a small fraction of citywide demand, and LADWP continues to confirm that adequate supplies exist to accommodate this growth through its diversified portfolio. <u>Finding</u> Finding: The project will not have a significant adverse impact on water supply. The estimated water demand of approximately 0.053 mgd is negligible in the context of LADWP's total supply capacity. The project is consistent with the growth projections analyzed in the Downtown Community Plan EIR, for which LADWP has demonstrated adequate water supply availability through the year 2040. Furthermore, compliance with state and local water conservation mandates (e.g., CalGreen, City of Los Angeles Water Efficiency Requirements) will ensure the efficient use of water resources. Therefore, sufficient water supplies are available to serve the project and reasonably foreseeable future development. Source Documentation: (1) (42) (43) (44) (56)
Public Safety - Police, Fire and Emergency Medical	2	<u>Fire Protection and Emergency Medical Services</u> The Sky Castle project is served by the Los Angeles Fire Department (LAFD). The project site (333 South Flower Street) is located within the Central Bureau service area. The primary responder for this location is Fire Station No. 3, located at 108 North Fremont Avenue, approximately 0.3 miles north of the project site. This station is equipped with a Task Force (truck and two engines), a search and rescue team, and a paramedic ambulance, ensuring robust coverage for the high-density Bunker Hill area.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Secondary support is provided by Fire Station No. 9 (430 East 7th Street) and Fire Station No. 10 (1335 South Olive Street). According to the Downtown Plan EIR, Station No. 9 is slated for demolition and reconstruction to expand its capacity to accommodate existing staff and resources. The proximity of Station No. 3 (well within the LAFD's maximum response distance of 0.75 miles for high-density areas) ensures that the project will have adequate emergency response times. The project involves the adaptive reuse of an existing structure (World Trade Center concourse) rather than new ground-up construction. However, the conversion to residential use will require strict adherence to the Los Angeles Fire Code, including the installation of fire sprinkler systems, adequate fire flow availability, and proper emergency access. Finding: The project is adequately served by existing fire and emergency medical facilities, specifically Fire Station No. 3. While the project will incrementally increase the demand for services by adding approximately 241 households, this growth is consistent with the projections analyzed in the Downtown Community Plan EIR. Compliance with all applicable Fire Code requirements and payment of standard taxes (which fund fire protection) will mitigate impacts to a level that is less than significant or not adverse. <u>Police Protection</u> The project site is served by the Los Angeles Police Department (LAPD), specifically the Central Area command. The nearest police station is the Central Community Police Station, located at 251 East 6th Street, approximately 1.0 mile east of the project site. The introduction of 241 new residential units will increase the permanent population in the area, potentially increasing the number of service calls. The Downtown Plan EIR notes that the Central Station is currently operating at or near capacity. However, the EIR determines that impacts from individual development projects are mitigated through "design out crime" features. The Sky Castle project will be required to incorporate security features such as controlled access, adequate lighting in public areas (hallways, parking, recreational spaces), and surveillance systems to reduce the demand on police resources. Finding: The project will result in an incremental increase in demand for police protection services. However, the project does not create a need for the construction of new police facilities that would result in physical

Environmental Assessment Factor	Impact Code	Impact Evaluation
		environmental impacts. By incorporating standard security design features required by the LAPD and City regulations (compliance with "Design Out Crime" guidelines), the project's impact on police services is considered less than significant or not adverse. Source Documentation: (1) (42) (43) (44)
Parks, Open Space and Recreation	2	<u>Project Recreational Demand</u> The Sky Castle project involves the adaptive reuse of the World Trade Center concourse to create 241 affordable housing units. This increase in the residential population of the Bunker Hill/Financial District area will generate additional demand for parkland and recreational facilities. <u>Existing Recreational Facilities</u> The Downtown Plan Area is currently served by approximately 86 acres of parkland. The project site (333 South Figueroa) is situated in a dense urban environment but is located near several key open space resources. • Maguire Gardens (located immediately south at the Central Library) is a 1.5-acre pocket park offering passive recreation. • Grand Hope Park (approx. 0.5 miles south) is a 2.5-acre pocket park serving the South Park district. • Pershing Square (approx. 0.4 miles east) is a 5-acre neighborhood park. • Grand Park (approx. 0.5 miles northeast) provides 12 acres of civic open space. • Elysian Park serves as the primary regional park facility for the area. According to the Downtown Plan EIR, the area currently has a park service ratio of approximately 3.2 acres per 1,000 residents, which is below the City's standard of 4 acres per 1,000 residents. With the projected population growth of the Downtown Plan (including projects like Sky Castle), this ratio is expected to decrease further unless significant new parkland is acquired. <u>Finding</u>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Finding: While the project will increase the use of existing neighborhood and regional parks, the impact is considered less than significant with compliance with regulatory requirements. Although the Downtown Community Plan EIR identified a significant and unavoidable cumulative impact regarding the deterioration of parks due to regional population growth, individual development projects mitigate their specific impact through the payment of fees. Pursuant to Los Angeles Municipal Code (LAMC) requirements (Quimby Act), the applicant will be required to pay park mitigation fees or dedication fees. These fees are collected specifically to fund the acquisition and improvement of parkland to offset the impact of new residents. By paying the mandated fees to support the City's park system, the Sky Castle project effectively mitigates its direct impact on recreational facilities. Source Documentation: (1) (42) (43) (44)
Transportation and Accessibility	2	Transportation <u>Traffic Generation and Vehicle Miles Traveled (VMT) Analysis</u> The Sky Castle project benefits significantly from being an adaptive reuse project that replaces a more traffic-intensive use (office space) with a less intensive one (affordable housing). Because the project is converting approximately 160,000 square feet of existing office space (of which ~101,000 sq. ft. is currently occupied) into 241 residential units, the traffic analysis applies a "credit" for the removal of the office trips. Trip Generation: ○ AM Peak Hour: The project results in a net reduction of 44 trips (fewer cars on the road during the morning commute). ○ PM Peak Hour: The project results in a net reduction of 72 trips (fewer cars during the evening commute). ○ Daily Trips: The project results in a net increase of only 57 daily trips. VMT (Vehicle Miles Traveled) Screening: ○ According to the Los Angeles Department of Transportation (LADOT) guidelines, projects that generate

Environmental Assessment Factor	Impact Code	Impact Evaluation
		a net increase of fewer than 250 daily trips do not warrant a formal transportation assessment. - o Since Sky Castle generates only 57 net daily trips, it screens out of the requirement for a full VMT analysis. <u>Finding</u> The project does not meet or exceed the thresholds that require a formal transportation assessment. Therefore, traffic impacts are considered less than significant under CEQA and not adverse under NEPA. <u>Accessibility and Transit</u> The project is located in a Transit Priority Area (TPA), which is defined as an area within one-half mile of a major transit stop. Transit Access: The site is situated in the heart of Downtown's transportation network. It is accessible via the Metro B and D Lines (Civic Center/Grand Park Station) and the Regional Connector stations (Grand Av Arts/Bunker Hill). This high level of transit accessibility supports the reduced reliance on automobiles for future residents. Pedestrian Access: The project retains existing pedestrian connections on Flower Street, Figueroa Street, and 3rd Street. The conversion to residential use typically generates more walking trips than the previous office use, activating the street level outside of standard business hours. <u>Site Access and Parking</u> Vehicle Access: The existing driveways will remain unchanged. Access is provided via: - o Entrance/Exit on the west side of Flower Street. - o Entrance/Exit on the east side of Figueroa Street. - o Entrance-only driveway on the south side of 3rd Street. Parking: The existing site contains a massive parking structure with 2,370 spaces. The project will reduce this number by 75 spaces to 2,295 spaces to accommodate structural and mechanical retrofits required for the housing conversion. This huge supply of existing parking means no new parking construction is required. <u>Finding</u>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		The Sky Castle project will have no significant impact on transportation. By converting office space to housing, the project actually reduces traffic congestion during peak commuting hours. Its location in a Transit Priority Area ensures excellent accessibility for residents without overburdening the local street network. Accessibility The building is served by an elevator and all common areas and units will be accessible. The project must comply with HUD accessibility standards and California Building Code Chapters 11A and 11B. A total of 10% of units must be Americans with Disabilities Act (ADA) compliant. No adverse impacts were identified. Source Documentation: (1) (42) (43) (44) (57) (Appendix G)
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The site is developed with buildings to be rehabilitated. There are no unique natural features or water resources on the site. There is no impact in this regard. Source Documentation: (3) (7) (22) (23)
Vegetation, Wildlife	2	The site is developed with buildings to be rehabilitated. There are no unique natural features or water resources on the site. There is no impact in this regard. Source Documentation: (3) (7) (22) (23)
Other Factors	1	The project will provide low-income, affordable housing for individuals and families on an underutilized commercial property. The project will provide a safe, clean, and sanitary place for residents in a location convenient to public transportation and other amenities. The project is beneficial to both residents and the community. Source Documentation: (1) (3)
Climate Change	2	While neither the SCAQMD nor the City of Los Angeles have established a threshold of significance for GHG emissions, the proposed Project is an infill housing project with diverse options including affordable units that would advance the smart growth policies of the California Air Resources Board's 2022 Climate Change Scoping Plan, including the local government strategies for local governments that call for all-electric new construction

Environmental Assessment Factor	Impact Code	Impact Evaluation
		standards, energy efficiency, and other best practices. The Project would also be consistent with the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, which call for land use strategies that reduce vehicle use and VMT. Similarly, the Project's infill profile would help ensure consistency with the City's General Plan Air Quality Element and the Green New Deal. Consistency with the above plans, policies, regulations, and GHG emissions reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts regarding climate change would be less than significant. No adverse impacts were identified. Source Documentation: (12) (13)

Additional Studies Performed:

See Source Documentation List

Site Visits

September 2025 – Cinnamon Crake, President, Bay Desert, Inc. via Google Earth

March 10, 2025 – Derrick Haynes, AEI Consultants – site reconnaissance

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

See Source Documentation List

List of Permits Obtained:

None.

Public Outreach [24 CFR 50.23 & 58.43]:

The project results in a Finding of No Significant Impact (FONSI) which will be published in the newspaper and circulated to public agencies, interested parties, and landowners/occupants of nearby parcels. Information about where the public may find the Environmental Review Record (ERR) pertinent to the project will be included in the FONSI Notice.

At the local level, the project approval is ministerial and the City has issued an Approval (ZI No. 2534); therefore a public hearing was not required.

Cumulative Impact Analysis [24 CFR 58.32]:

The project is rehabilitation/adaptive re-use of two floors of an existing building. The project will increase residents in the neighborhood, but the additional residents are negligible (0.0002% of the population of the City of Los Angeles).

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

The project is rehabilitation. Alternative unit sizes were considered but rejected for the proposal, which is considered the superior alternative.

No Action Alternative [24 CFR 58.40(e)]:

No change to the site would occur. The impacts discussed in the Environmental Assessment would not occur. The site would continue in its current state. Additional affordable housing units would not be created. Existing commercial/office space would remain.

Summary of Findings and Conclusions:

The project is suitable from an environmental standpoint. As long as the Mitigation measures are adhered to, there are no anticipated adverse effects from the project.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Air Quality	AQ1. Due to proximity to the freeway, MERV13 filtration is required for each unit. AQ2. An Operations and Maintenance Plan (O&M) that details regular inspection and filter changes is required.
Contamination	CT1. According to the City of Los Angeles Department of Building and Safety and Department of Planning, the subject property is located near significant oil production areas known as “Methane (Buffer) Zones.” Methane (Buffer) Zone sites include properties immediately surrounding gas sources where testing and mitigation are required by the City of Los Angeles Department of Building and Safety. Due to the potential environmental risk associated with construction in Methane (buffer) Zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property (Division 71 of the Los Angeles Building Code). CT2. Regardless of building construction date, the Environmental Protection Agency’s (EPA’s) National Emission Standards for Hazardous Air Pollutants (NESHAP) requires that an asbestos survey adhering to Asbestos Hazard Emergency Response Act (AHERA) sampling protocol be performed prior to demolition or renovation activities that may disturb Asbestos Containing Materials (ACM). The NESHAP regulation specifies that all suspect ACMs be sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants. Based on the potential presence of ACMs throughout the remainder of the building, an Operations & Maintenance (O&M) Plan which stipulates that the repair and maintenance of damaged materials should be performed to protect the health and safety of the building occupants. A thorough asbestos survey is required to identify asbestos-containing building materials in accordance with the EPA NESHAP 40 CFR Part 61 prior to demolition or renovation activities that may disturb suspect ACMs. CT3. Due to the age of the building (51 years), there is a potential that Lead-Based Paint (LBP) is present. The property owner shall consult with a certified Lead Risk Assessor to determine options for control of possible LBP hazards, including water damaged painted walls in stairwells. Stringent

Law, Authority, or Factor	Mitigation Measure
	Federal, State and local regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the Occupational Safety and Health (OSHA) lead standard contained in 29 CFR 1910.1025 and 1926.62. CT4. Complete abatement of hazardous materials is preferred. All HUD lead safe standards apply. Of any hazardous materials remain, an Operations & Maintenance Plan (O&M) is required.
Historic Preservation Act	TCR-1. <u>Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities</u> The project applicant shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be present prior to the commencement of initial ground disturbance at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work); and during any required additional ground disturbance that digs deeper than initial excavation. “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, tree removal, boring, grading, excavation, drilling, and trenching. In the event of a discovery, it is agreed that all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume. The area may be flagged off until the resource has been fully assessed by the Tribe monitor and/or Tribe archaeologist. Work may still continue in other areas. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well

Law, Authority, or Factor	Mitigation Measure
	as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. TCR-2. <u>Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)</u> Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes. TCR-3. <u>TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects</u> Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Law, Authority, or Factor	Mitigation Measure
Relocation	RL1. The project will involve relocation of commercial tenants. The project is subject to the Uniform Relocation Act (46 U.S.C. § 4601 et seq.), passed by Congress in 1970, its implementing regulations (49 C.F.R.) Part 24); the California Relocation Assistance Law, California Government Code Section 7260 et seq (the “CRAL”) and the California Relocation Assistance and Real Property Acquisition Guidelines, Title 25, California Code of Regulations, Chapter 6, Section 6000 et seq., and the City of East Palo Alto Municipal Code Chapter 14.02 (Ordinance No. 374), Tenant Protections, (jointly the “Rules and Regulations”). A conforming relocation plan shall be prepared to the extent as required by applicable law.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: _____

Date: April 20, 2026

Name/Title/Organization: Cinnamon Crake, President, Bay Desert, Inc.

Certifying Officer Signature: _____

Date: _____

Name/Title: Anthony Sertich, Executive Director

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

Sky Castle Source Documentation – April 2026

1. **Rockefeller Partners.** *Design Drawings, Sky Castle I, 333 Flower, Los Angeles, CA.* May 10, 2025.
2. **City of Los Angeles.** *Housing Element of the General Plan.* 2021-2029.
3. **Crake, Cinnamon.** *Report Preparer/Professional Knowledge.* s.l. : Bay Desert, Inc., August 27, 2025.
4. **AEI Consultants.** *Phase I Environmental Site Assessment, 350 South Figueroa Street, Los Angeles, Los Angeles County, California 90071.* Walnut Creek, CA : s.n., March 11, 2025. AEI Project No. 506578.
5. **Langan Engineering and Environmental Services, Inc.** *Archaeological Resources Assessment Report for 333 Flower Street Project, Los Angeles, California.* Santa Barbara, CA : s.n., May 2025. Langan Project No. 781029501.
6. **Matthews.** The state of the Los Angeles Market / Impact on Affordability. [Online] [Cited: October 16, 2023.] <https://www.matthews.com/the-state-of-the-los-angeles-market-impact-on-affordability/#:~:text=Additionally%2C%20the%202022%20Affordable%20Housing,conditions%20have%20proliferated%20affordability%20issues..>
7. **Alphabet.** *Google Earth Professional.* 2025.
8. **Los Angeles County Airport Land Use Commission.** *Airport Land Use Plan.* s.l. : Department of Regional Planning, Adopted December 19, 1991.
9. **City of Los Angeles.** *Van Nuys Airport Plan.* s.l. : Department of City Planning, January 2006.
10. **United States Government.** The Coastal Barrier Resources Act of the United States. Enacted October 18, 1982. CBRA, Public Law 97-348.
11. **U.S. Department of Homeland Security.** *Flood Insurance Rate Map.* s.l. : Federal Emergency Management Agency, Effective Date December 21, 2018. FIRM Panel No. 06037C1617G.
12. **Douglas Kim & Associates, LLC.** *Part 50 EA 333 Flower Street.* May 9, 2025.
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19. —. *Coastal Zone Map.* s.l. : Planning Department, October 2003.
20. **California Coastal Commission.** *Coastal Zone Map of Los Angeles County.* Accessed on August 28, 2025.

21. **Methane Specialists.** *Methane Investigation Report REVISED, Adaptive reuse of an existing office building into affordable housing unit, 333 Flower Street, Los Angeles, CA 90071.* Agoura Hills, CA : s.n., October 8, 2025. J4277R1.
22. **United States Department of the Interior.** *List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project, Sky Castle.* Carlsbad, CA : Fish and Wildlife Service, Carlsbad Fish and Wildlife Service, September 15, 2025. Project Code: 2025-0149716.
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29. **U.S. Department of Housing and Urban Development.** *Tribal Directory Assessment Tool.* August 26, 2025.
30. **Green, Andrew.** *Letter to Megan Doukakis, UltraSystems Environmental in re: Sky Castle Project, Los Angeles County.* West Sacramento, CA : Native American Heritage Commission, August 29, 2025.
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Appendix A – Project Description

- **Rockefeller Partners.** *Design Drawings, Sky Castle I, 333 Flower, Los Angeles, CA.* May 10, 2025.

Appendix B – Airport Clear Zones

Sky Castle

350 South Figueroa (333 South Flower Street), Los Angeles, Los Angeles County, California 90071 (APN 5151-011-020)

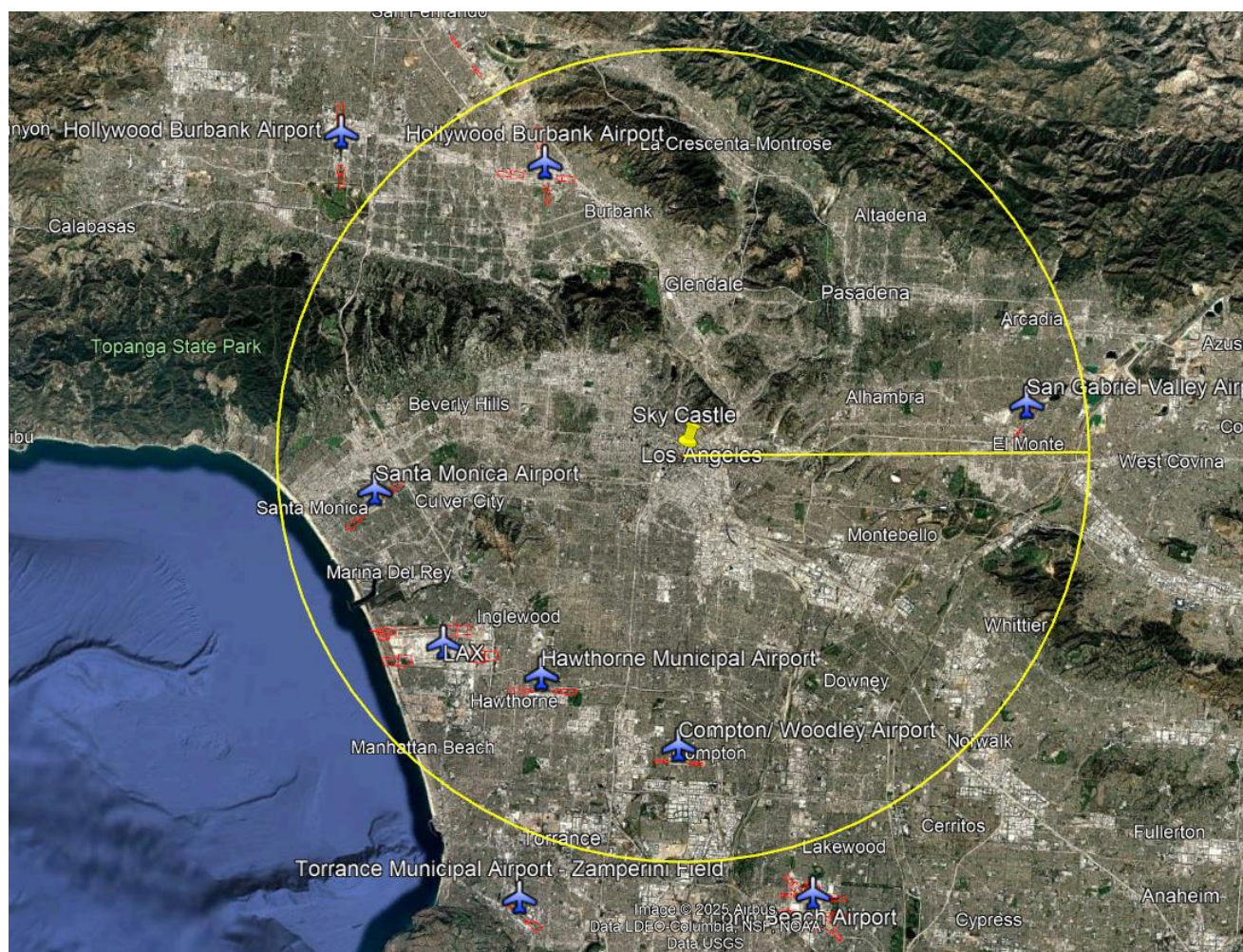


Figure 7 Airports within fifteen miles of the subject site with runway protection zones (in red)

Table 7 Distance to nearby airports

Airport type	Name	Distance from subject (Miles)	Airport Clear Zone
Major Airport	Los Angeles International Airport (LAS)	11.5 miles to the south-southwest	No
Military Airfield	None	n/a	n/a
Minor Airport	San Gabriel Valley Airport	13.06 miles to the east	No
Minor Airport	Hollywood Burbank Airport	11.97 miles to the north	No
Minor Airport	Santa Monica Airport	11.62 miles to the west	No
Minor Airport	Compton/Woodley Airport	11.43 miles to the south	No
Minor Airport	Hawthorne Municipal Airport	10.24 miles to the south- southwest	No

Appendix C – Floodplains, Wetlands & Endangered Species

- **U.S. Department of Homeland Security.** *Flood Insurance Rate Map*. s.l. : Federal Emergency Management Agency, Effective Date December 21, 2018. FIRM Panel No. 06037C1617G.
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